

SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - SDA

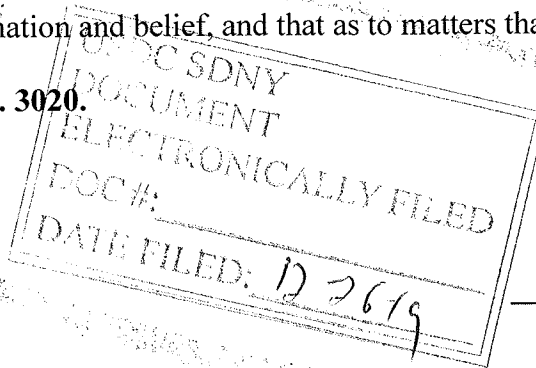
**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
(FOLEY SQUARE)**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

**NOTICE OF MOTION FOR LEAVE OF COURT TO ADD MARCUS
CONTE AS A DEFENDANT PURSUANT TO RULE 20(a)(2)**

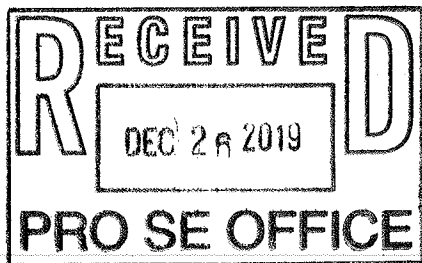
This pleading is true to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believes are true.

See NY C.P.L.R. 3020.



Signed under penalty of perjury,

D. George Sweigert,
c/o General Delivery
Rough and Ready, CA 95975
Spoliation-notice@mailbox.org



12.18.19

SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - SDA

**D. G. SWEIGERT, C/O
GENERAL DELIVERY
ROUGH AND READY, CA 95975
Spoliation-notice@mailbox.org**

D George Sweigert

Plaintiff

CIVIL CASE #: 1:18-CV-08653-VEC

v.

JUDGE VALERIE E. CAPRONI

Jason Goodman

MAGISTRATE STEWART D. AARON

Defendant

CERTIFICATE OF SERVICE

**I HEREBY ATTEST that a true copy of the attached pleadings have been
sent to the following addressees on the 19th day of December 2019.**

**Jason Goodman, CEO
Multi-media Design Systems, Inc.
252 7th Avenue, Apart. #6S
New York, NY 10001**

**PRO SE OFFICE, Room 200
U.S. District Court
500 Pearl Street
New York, New York 10007-1312**

 /

D. GEORGE SWEIGERT

12.19.19

SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - SDA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
(FOLEY SQUARE)

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

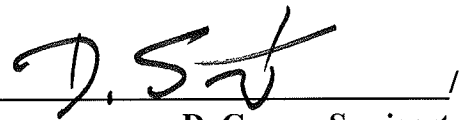
EXHIBIT TO ACCOMPANY MOTION

PROPOSED COMPLAINT FOR MARCUS CONTE PUTATIVE DEFENDANT

This pleading is true to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believes are true.

See NY C.P.L.R. 3020.

Signed under penalty of perjury,



**D. George Sweigert,
c/o General Delivery
Rough and Ready, CA 95975
Spoliation-notice@mailbox.org**

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SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - SDA

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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SWEIGERT	CIVIL CASE #:
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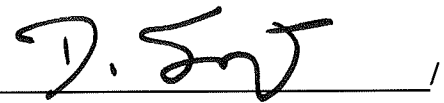
PLAINTIFF'S VERIFIED COMPLAINT AGAINST MARCUS CONTE

STATEMENT AND VERIFICATION

This pleading is true to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believe are true. See N.Y.

C.P.L.R. 3020.

Signed under penalty of perjury,



**D. George Sweigert,
c/o General Delivery
Rough and Ready, CA 95975
Spoliation-notice@mailbox.org**

12.19.19

COMPLAINT FOR DAMAGES

The Plaintiff, D. George Sweigert, alleges as follows:

STANDING

1. For the purposes of this pleading the Plaintiff alleges that more than \$75,001 in damages have been the result of the alleged misconduct of the putative defendant Conte. Plaintiff is presently a resident of California and claims a diversity issue.

PARTIES

2. For the purposes of this pleading the parties should be construed as the Plaintiff (undersigned) and Marcus Conte of Brooklyn, New York as the putative defendant.

3. As indicated on page 30 of ECF Doc. No. 129, Conte styles himself as a “WHITE male with a criminal arrest & conviction record, drug & alcohol history (disability)..”. See below.

Wednesday, July 22, 2015

STATEMENT OF CLAIM
CASE # 10176716

Marc Conte
199 Gelston Avenue, D1
Brooklyn, NY 11209
347-733-4780
shorthappylife@gmail.com

Dear Division,

I am a 51-year old WHITE male with a criminal arrest & conviction record, drug & alcohol history (disability), and I am a practicing vegan-Buddhist. I was hired by the City of New York on December 08, 2014 as a Sanitation Enforcement Agent (SEA). I do not fit-in in any way with the majority of 95% younger black & Hispanic Christian supervisors and co-workers. Despite

Above: Page 30 of ECF Doc. No. 129


4. Conte is an associate, proxy and joint tortfeasor with Defendant (Def.) Goodman. As the Court is aware, both Conte and Def. Goodman made a series of videos to showcase Conte’s dispute with the Department Sanitation of New York (DSNY) in 2017 (as Conte’s DSNY “ticket quota story was broadcast on a local “7 On Your Side” commercial television station in 2015).

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ECF Doc. No. 129 pages 15 to 16 document the Conte/Goodman videos. A sample appears below.

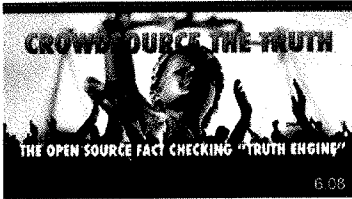
Case 1:18-cv-08653-VEC-SDA Document 129 Filed 12/11/19 Page 15 of 30

Sweigert v. Goodman, USDC for the SDNY



FULL INTERVIEW: 'DSNY WhistleBlower' w/ Jason Goodman CSTT - 09/19/2017

Marcus Conte
1 year ago • 159 views
REPORTED FROM 9/9/17 <https://youtu.be/zD8YAZSK5M4> LIVE STREAM INTERVIEW w/ Jason Goodman / Crowd Source The



INTERVIEW: On The Court Steps w/ Jason Goodman, March 07, 2018 Conte v DSNY

Marcus Conte
1 year ago • 164 views
<https://youtu.be/WelHj9UQIUA> Watch The LIVE STREAM INTERVIEW on the steps of the courthouse w/ Jason Goodman of Crowd ..

5. The Court may recall the picture of Conte and Goodman joking around as seen on page 3 of ECF Doc. No. 90. See below (Goodman on left, Conte on right).



Deconstructing Dave Acton The Failed Actor

Marcus Conte
✓ Subscribed 9.95K
+ Add to Share ... More

622 views

Like Dislike

Published on Sep 14, 2019
Marcus Conte Reporting
<https://patreon.com/marcusconte>
<https://paypal.me/theghostofbrooklyn>

BACKGROUND

6. On two separate occasions Marcus Conte, a self-described 55 year old white male (199 Gelston Avenue, D1, Brooklyn New York, 11209), has sent electronic mail messages from his e-mail account (shorthappylife@gmail.com) to the Presiding Judge, Valerie Caproni (9/12/2019 and 12/3/2019). In the second e-mail message, a copy was sent (via cc:) to the Magistrate Judge Aaron D. Stewart. These e-mail messages were followed up with U.S. Mail delivery of the attached PDF document letters.

7. The transmission of these unauthorized e-mail messages was accompanied by putative defendant Conte's social media broadcasts heralding of these e-mail transmissions. Conte's podcasts memorialized these e-mail transmissions in a highly public manner. Other social media podcasts include Conte's telephone calls made to the Federal Bureau of Investigation (F.B.I.) reporting the Plaintiff for purported criminal conduct. These podcasts pander to Conte's audience with the dramatic setting of communications to federal authorities of all types.

8. Conte operates several on-line social media accounts where he simultaneously posts his social media podcasts; include:

<https://youtube.com/c/marcusconte>
<https://dlive.tv/MarcusConte>
<https://twitter.com/ghostofbklyn>
<https://facebook.com/marcus.conte.7>
<https://minds.com/marcusconte>
<https://twitch.tv/marcusconte>
https://bitchute.com/channel/marcus_c...
<https://steemit.com/@marcusconte>
<https://d.tube/#!/c/marcusconte>
<https://gab.ai/marcusconte>

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9. In Conte's e-mail message of 9/12/2019 to the presiding judge, Conte cites this lawsuit's case number and the complete mailing address of the judge's chambers and her honor's e-mail address. Conte alleged, in this widely disseminated e-mail message (posted publicly to Google Docs), that, "[n]ot only is Plaintiff a documented conspiracy kook, he engages in routine online Cyber Bullying, Harassment & Perjury," (letter attached as **EXHIBIT ONE**). Conte continues, "Sweigert commits perjury against the Court because he is deliberately misleading the Court about his Public online presence & nefarious engagement". Conte goes on to accuse the undersigned of violations of 18 U.S.C. § 1001(a).

10. The title of the particular video (described above) is, "Dave Acton Sweigert Charged With Cyber Bullying, Harassment & Perjury Before SDNY Judge Valeria E. Caproni 1:18-CV-08653-VEC". Conte made the letter available via Google Docs to world wide distribution at Uniform Resource Locator (URL):

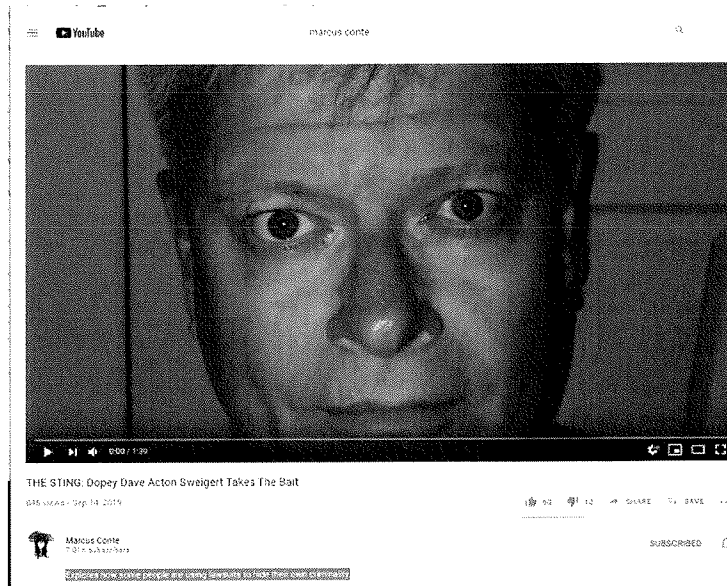
<https://drive.google.com/file/d/1GNH5Wkf7rivxFBaZpiao1dckwSpCIV4p/view>

11. In Conte's second e-mail communication to the presiding judge and the magistrate judge (attached as **EXHIBIT TWO**) on 12/3/2019 Conte accuses the undersigned of "willfully and repeatedly engaged in Witness Tampering in violation of 18 U.S.C. § 1512 (b)." According to Conte the "Plaintiff frames Def. Jason Goodman & myself as kidnappers in a domestic terror operation that uses a flame-throwing drone to blow up LNG tanks in the Port of Corpus Christie TX". Conte then adds, "[h]ere is the law that I believe he is in violation of at least 24 times" 18 U.S.C. 1512. Tampering with a witness, victim, or an informant." Conte provided an attached PDF file with the e-mail message and Google Docs link; URL

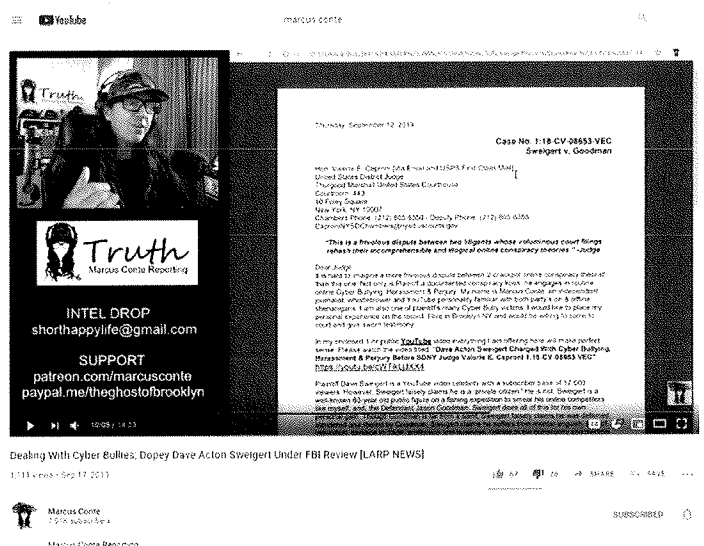
<https://drive.google.com/file/d/1H7EM3QSTFG4KyqK83xboabiyZAgLM17v/view> (attached as **EXH. TWO**).

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12. In Conte's video podcast entitled, "THE STING: Dopey Dave Acton Sweigert Takes The Bait," published 9/14/2019, accompanied with the video description "Explores how some people are using lawsuits to hide their own criminality," Mr. Conte displays a private non-public photograph and/or likeness of the Plaintiff. Mr. Conte included commentary that the plaintiff was a "sociopath", "psychopath" and "criminal", etc. See below.



13. In Conte's video podcast entitled, "Dealing With Cyber Bullies; Dopey Dave Acton Sweigert Under FBI Review [LARP NEWS]," published 9/17/2019, accompanied with the video description "Marcus Conte Reporting... <https://patreon.com/marcusconte> <https://paypal.me/theghostofbrooklyn> ." Mr. Conte included commentary that the plaintiff was a "sociopath", "psychopath" and "criminal", etc.; see below.

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14. Mr. Conte displays his first letter and e-mail message to the presiding judge with his commentary. At time-mark 3:55 Conte begins his recorded discussion with an F.B.I. agent and names the Plaintiff as a terrorist criminal and conflates the undersigned with another third-party “Thomas Schonberger”. The crux of Conte’s call to the F.B.I. call is that the Plaintiff and Thomas Schoenberger are engaged in a variety of illegal misconduct directed at Conte – cyber stalking, harassment, extortion, blackmail, etc.”

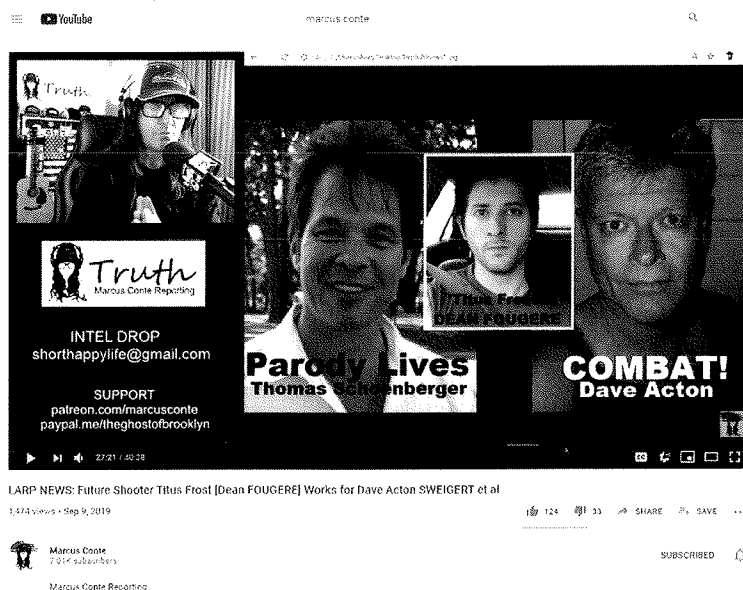
15. As the Court will learn, the Plaintiff has no relationship whatsoever with Thomas Schoenberger (who was named by Def. Jason Goodman several times as a member of the vast conspiracy of players associated with Goodman’s Virginia lawsuit ((*Steele v. Goodman*, Civil Action No. 3:17cv601 (E.D. Va. Jul. 25, 2019))). For clarity, and not for purposes of re-litigation, the Court should note that Def. Goodman filed documents in the Virginia lawsuit that accused Thomas Schoenberger of someone “placed high in the organization of the monetized conspiracy.” Reference ECF Doc. No. 134, para. 13, shown below.

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13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 7

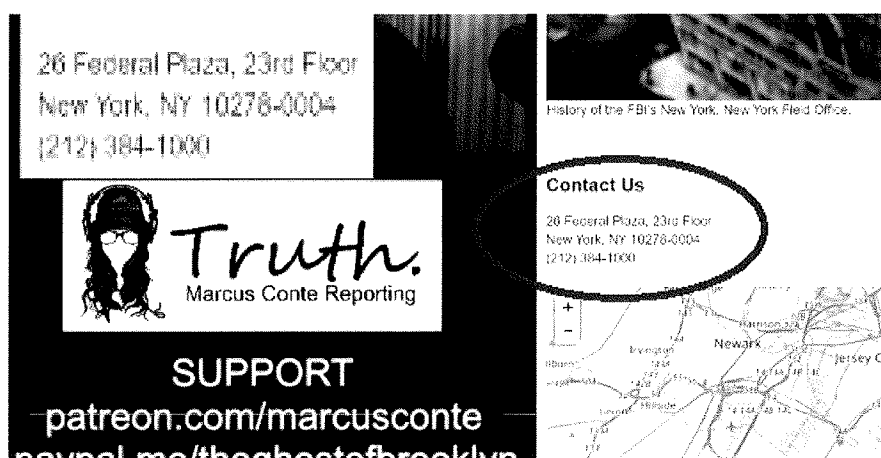
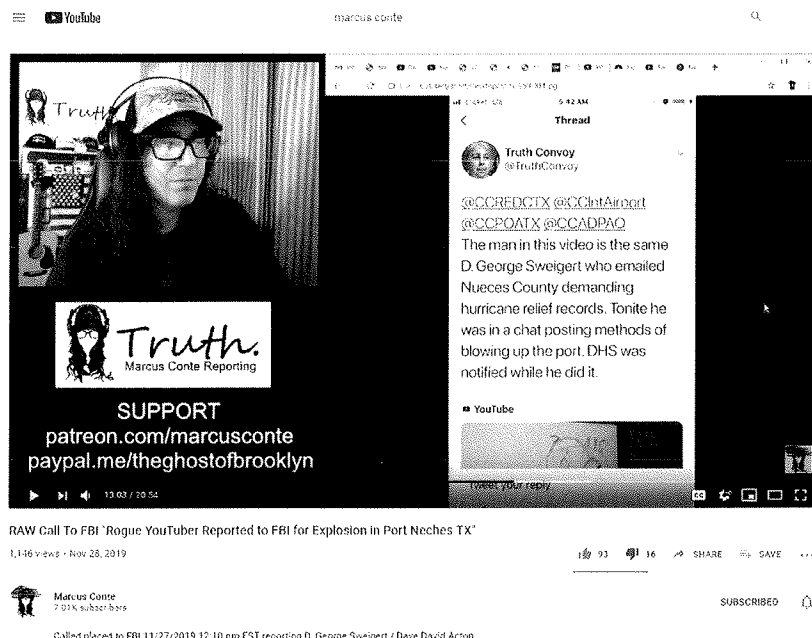
from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

16. In Conte's video podcast entitled, "LARP NEWS: Future Shooter Titus Frost [Dean FOUGERE] Works for Dave Acton SWEIGERT et al," published 9/9/2019, accompanied with the video description ""Marcus Conte Reporting... <https://patreon.com/marcusconte> <https://paypal.me/theghostofbrooklyn> ," putative defendant Conte conflates the Plaintiff with Thomas Schoenberger and Dean Fougere (known as "TITUS FROST" on social media) by accusing all three individuals of criminal activity. Again, Conte accuses Plaintiff of crimes, gang-stalking, being a terrorist, harassment, etc. Mr. Conte included commentary that the plaintiff was a "sociopath", "psychopath" and "criminal", etc.; see below.

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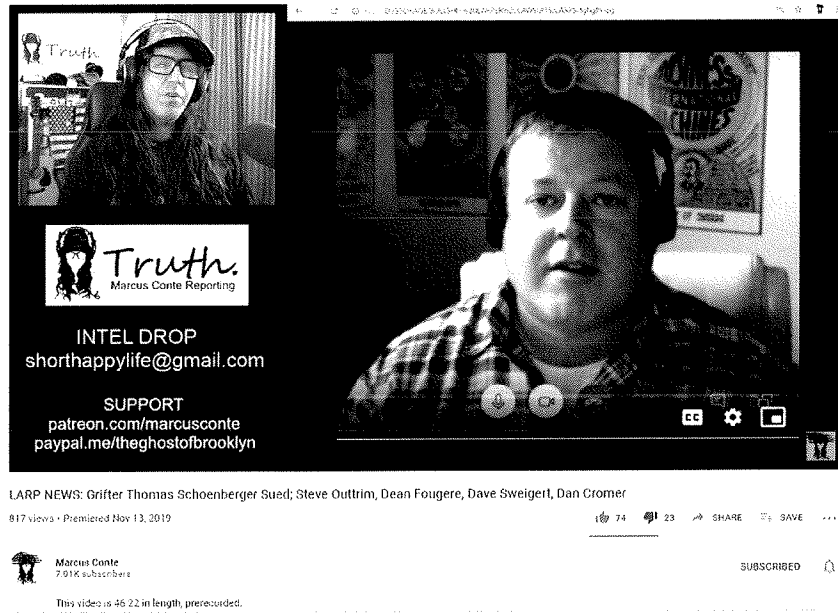
17. The Plaintiff has no relationship with Titus Frost, who is named as another co-conspirator named by the **Def.** “TITUS FROST” is alleged to be associated with the cast of characters in the Virginia lawsuit that are conspiring against the **Def.** At para. 52 of the Def.’s Counter-Claim papers (# 122) Def. lists “**Dean Fougere aka Titus Frost**” as a co-conspirator and “party”.

18. In Conte’s video podcast entitled, “RAW Call To FBI "Rogue YouTuber Reported to FBI for Explosion in Port Neches TX", published 11/28/2019, accompanied with the video description, “Called placed to FBI 11/27/2019 12:10 pm EST reporting D. George Sweigert / Dave David Acton 'terrorist' video”, Conte again records a call to an F.B.I. field officer in New York to report the Plaintiff for threatening to “blow up a port”. The F.B.I. field office at 26 Federal Plaza, 23rd Floor, New York, N.Y. 10278-0004 is the recipient of these calls. Mr. Conte included commentary that the plaintiff was a “sociopath”, “psychopath” and “criminal”, etc.; see below.

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19. In the Conte video entitled, “LARP NEWS: Grifter Thomas Schoenberger Sued; Steve Outtrim, Dean Fougere, Dave Sweigert, Dan Cromer,” published 11/13/2019, accompanied with the video description, “Read the amazing Gabe Hoffman Lawsuit: <https://drive.google.com/file/d/1HHJr...>”, Conte conflates the Plaintiff, Thomas Schoenberger, Steve Outtrim, Dean Fougere and Dan Cromer into a criminal-level gang-stalking, blackmail, extortion enterprise. Mr. Conte included commentary that the plaintiff was a “sociopath”, “psycho-path” and “criminal”, etc.; see below.

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20. In the above described video podcast by Conte, the Court should take note that Steve Outtrim is another figure named by Def. Jason Goodman as participating with a group of co-conspirators to defame, harass and cyber stalking Goodman. Def. named Steve Outtrim in his “third Party Claim” (ECF Doc. 123). Thus far, at least three individuals appear to have something in common with Marcus Conte and the Def. – Thomas Schoenberger, Dean Fougere, and Steve Outtrim – all previously named as co-conspirators by Goodman.

21. In the Def.’s Counter-Claim papers (# 122) paragraphs 28 through 33 Goodman recites allegations against Steve Outtrim, a third party to this litigation (ECF Doc. No. 123) in both the S.D.N.Y. and Virginia lawsuits.

22. At para. 33 (ECF. Doc. 122) the Def. states, “[t]he most recent publication of the Outtrim false allegations and the overt efforts to link Goodman to terrorism and crimes Goodman has no knowledge of our involvement in represents a pattern and practice when viewed in the context of the incidents in question in Steele v. Goodman, and yet another overt act in the furtherance of the conspiracy.” At para. 48 in the Counter-Claim (#122) Steve Outtrim is listed

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as a “co-conspirator” and “party”. Apparently, Conte has interviewed Steve Outtrim on his podcast show (see photo above in podcast screen shot).

23. Steve Outtrim notably interviewed another “co-conspirator” on his own social media podcast show, former Goodman sidekick “Queen Tut” aka Susan B. Holmes of Fort Collins, Colorado. She is a co-defendant in the Virginia lawsuit (along with Def.) and both Outtrim and “queen Tut” are named by Goodman as co-conspirators in *Def’s* ECF Doc. No. 123. “Queen Tut” (aka Susan B. Holmes of Fort Collins, Colorado) is a co-defendant with Goodman in the Virginia lawsuit.

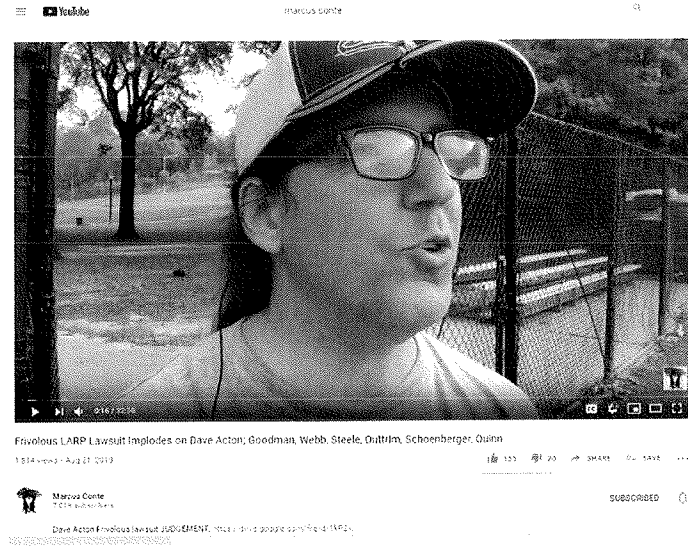
24. In the video entitled, “Frivolous LARP Lawsuit Implodes on Dave Acton; Goodman, Webb, Steele, Outtrim, Schoenberger, Quinn”, published 8/20/2019, accompanied with the video description, “Dave Acton Frivolous lawsuit JUDGEMENT:

<https://drive.google.com/file/d/1kP2v...> Lost in LARPville – with Steve Outtrim

<https://www.youtube.com/watch?v=UDHad...>”, Conte again conflates the Plaintiff with George Webb Sweigert, Robert David Steele, Steve Outtrim, Thomas Schoenberger, and Quinn

Michaels. George Webb Sweigert has been named as a co-conspirator along with Robert David Steele (plaintiff in the Virginia lawsuit). Mr. Conte included commentary that the Plaintiff was a “sociopath”, “psychopath” and “criminal”, etc.; see below.

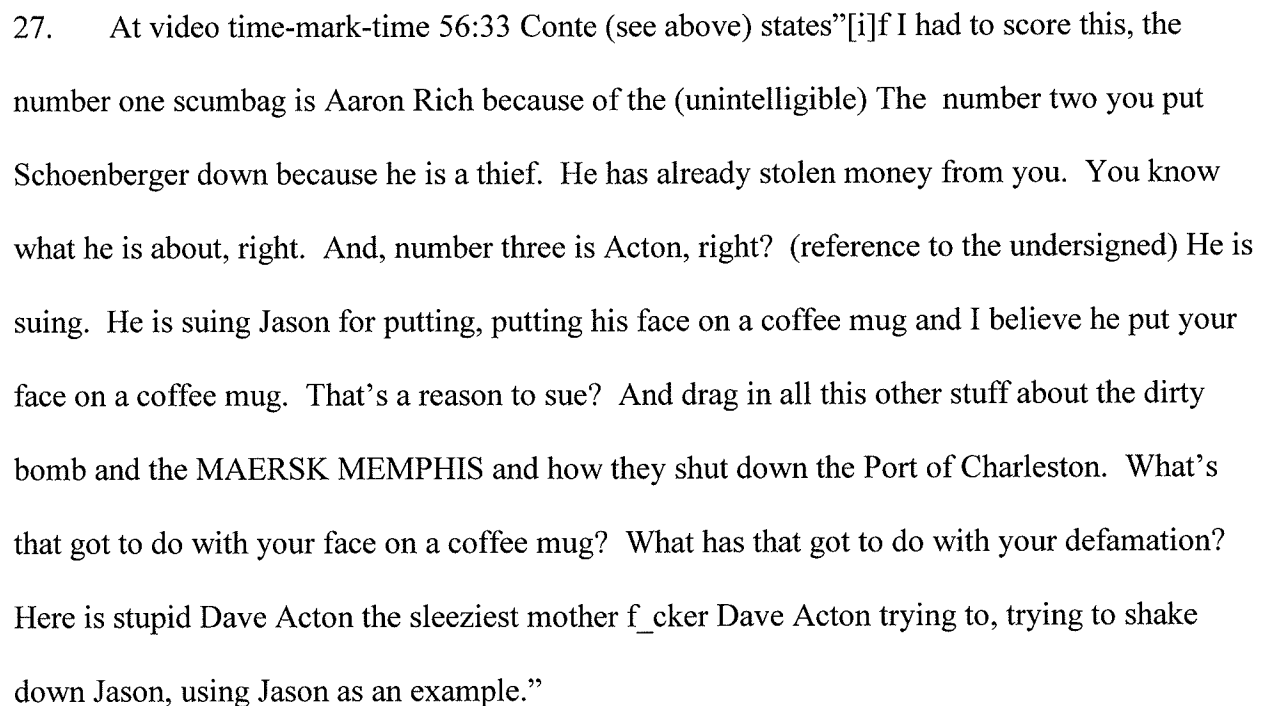
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25. For clarity the Court is reminded of **EXH. C** to the **Def.’s** Counter-Claim papers (# 122) which provides a recap of conspiracy of players (pg. 50, # 122). Those names on the **Def’s** recap list mentioned by Conte have been placed in bold face (see below).

“**Robert David Steele**, (hereinafter “Plaintiff” or “Steele”) Counsel for Plaintiff, Steven S. Biss, (hereinafter “Biss”) his paralegal wife Tanya Cornwell (hereinafter “Cornwell”), denied intervenor applicant **David George Sweigert** (herein after “Sweigert”), his brother **George Webb Sweigert** (herein after “Webb”) and an individual named **Manuel Chavez, III** (hereinafter “Chavez”) have conspired with one another as well as others to bring this instant legal matter in conjunction with additional lawsuits in foreign jurisdictions in order to harass, defame and otherwise disrupt the business and day to day activities of the Defendant Goodman.”

26. Not surprisingly, Mr. Conte has also featured another Goodman Virginia lawsuit “co-conspirator” in his video podcasts – **Manuel Chavez, III**. In the Conte video podcast entitled, “REPLAY: Marcus Conte v. Defango Live Debate Showdown” 7-3-2019, published 7/4/2019, with the accompanied by the video description “Re-posted with expressed written consent of Defango TV”.



Chavez was a subpoenaed witness in that litigation, as well as Thomas Schoenberger.

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29. Both individuals (Chavez and Schoenberger) were subpoenaed as witness by attorneys representing Aaron Rich. Questions orbited the Aaron Rich lawsuit about the company the pair (Chavez/Schoeneberger) had created in the fall of 2017 to form a “reputation defense” company known as “SHADOWBOX STRATEGIES”. The first client of the pair’s “SHADOWBOX STRATEGIES” was the former FOX News contributor and Dallas, Texas businessman Ed Butowski, who paid the pair \$20,000 for “reputation defense”. “Reputation defense” is a euphemism for “smear campaign”.

30. The Court should recall the link between Manuel Chavez, III and Thomas Schoenberger as alleged by the Def. in the Virginia lawsuit.

13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 7

from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

31. To refresh the Court's memory the “coffee mug” Marcus Conte is referring to the RedBubble. Com merchandise, including coffee mugs, displaying the likeness/photograph of the undersigned, Manuel Chavez, III (aka DEFANGO) and Robert David Steele (see below).

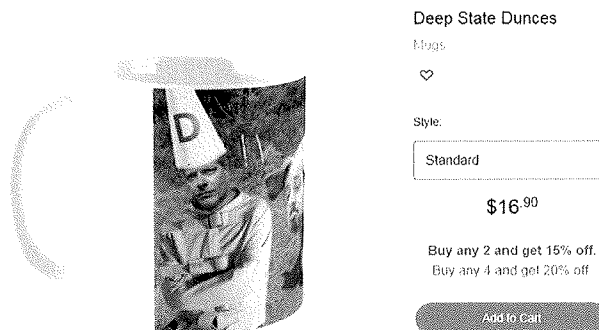
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video may be accessed by clicking the following hyperlink
<https://www.youtube.com/watch?v=GNxCk6nqFJg&feature=youtu.be>. The video opens
with the following insulting picture and words:¹⁴



Above image from Amended Complaint, Virginia lawsuit
(left to right) undersigned, Manuel Chavez, III, Robert David Steele



Plaintiff depicted on CSTT RedBubble coffee cup

(<https://www.redbubble.com/people/csthetruth/works/29102359-deep-state-dunces?p=mug>)

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Above image from Second Amended Complaint (ECF No. 88)



CSTT tote bag with Plaintiff's likeness (far left) advertised on RedBubble.com

Above image from Second Amended Complaint (ECF No. 88)



Above: Jason Goodman seen in podcast drinking from coffee mug in question

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32. Seven (7) days prior to the Conte/Chavez podcast, Def. Goodman called Chavez in a phone call that was inadvertently broadcast on YouTube in a “livestream” on 6/26/2019. Seven days later a Conte and Chavez video podcast (described above (7/3/2019)) was distributed that focused social media attacks on the Plaintiff and Schoenberger (Chavez’s partner in SHADOWBOX STRATEGIES).

33. According to the **Def.**, Chavez was in extensive communications with **Def.** via e-mail messages and phone calls (see **EXHIBIT THREE** attached). During a live stream podcast of the two (Chavez/Goodman), that inadvertently recorded, Goodman can be heard coaching the witness (Chavez) on what to tell the Virginia Bar Association to endanger the law license of Steven S. Biss, esq and to “shoe-horn” or push Plaintiff into a conspiracy narrative.

GOODMAN: Something you would write to the Bar Association saying “hey, look, this judge determined that it is likely that Biss is making these inappropriate payments. He is not supposed to be paying you, if you’re his client, and particularly if that payment is coming at a time you are engaged in activities like making videos about his lawsuit, that spread allegations out across the Internet, that aren’t true. Things like that. So, that is my position that he had someone paying you to do that stuff. **He’s been working with Robert David Steele, you were working for Robert David Steele, at the time, Sweigert [undersigned] was working with you, Tyroan Simpson was working with you and Sweigert and these are the elements of conspiracy.**

CHAVEZ: Yeah, I mean you got the conspiracy down pretty well. I mean. I will send you everything that shows she was on my Patreon and she was paying me on Patreon, for sure. **But, was I working in concert with Dave Acton [undersigned] and those guys (?), yeah, f_ck it, why not. I will say whatever. (Laughter) [emphasis added] (EXHIBIT THREE para. 22)**

34. Seven (7) days between the time Def. was caught coaching the witness (Chavez) in the Aaron Rich lawsuit and the Virginia lawsuit and the time of the Chavez/Conte social media podcast attacking Aaron Rich and the Plaintiff. Seven days.

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35. In the video entitled, “July 4th Independence Day, My ‘Debate’ With Defango, LTV Apology”, published 7/4/2019, accompanied with the video description, “Marcus Conte Reporting..” Conte issues a series of veiled threats against the undersigned.

At time-mark 11:43:

CONTE. Where I grew up every once in a while, you can be the tough guy with your big mouth and your big lawsuits. But every once in a while you punch the wrong guy. You just, you just tangled with the wrong mother_cker. Right? And you don’t know what hit you. And that’s all I am saying, right? That’s all I am saying. I am not threatening anybody. I am just tell you. That sometimes you mess with the wrong guy.

At time-mark 12:36:

When you step it up to physical threats or, trying to drag people .. and .. and ..to courts and extort them for information and money. Now we are talking about something else. **And for that, that is unforgiveable.** Alright? “[emphasis added]



July 4th Independence Day, My ‘Debate’ With Defango, LTV Apology

944 views · Jul 4, 2019

85 13 SHARE SAVE



Marcus Conte
7K subscribers

SUBSCRIBED



36. In the video entitled, “Fugitive in Port Neches Explosion May Face Criminal Charges; Plus, Gabe Hoffman Defamation Lawsuit”, published 12/3/2019, accompanied with the video description, “LETTER TO COURT: <https://drive.google.com/open?id=1H7E...>,” Conte walks his audience through the 12/3/2019 e-mail message sent to the presiding judge and the magistrate judge. Through-out the video Conte refers to the Plaintiff as a fugitive from justice in

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connection with the Port Neches, Texas explosions at the TPC factory. Mr. Conte's tone is that of a request for assistance from the public to locate the Plaintiff as he is wanted for the Port Neches, Texas bombing. Mr. Conte included commentary that the plaintiff was a "sociopath", "psychopath" and "criminal", etc.; see below.



37. To refresh the Court's memory about Port Neches, Texas, news reports state:

PORT NECHES, Texas — Small fires from inside the TPC Group plant in Port Neches continues to burn 10 days after massive explosions, according to a Saturday morning news release from the Port Neches Response team.

<https://www.12newsnow.com/article/news/local/saturday-morning-update-on-tpc-explosion/502-79eeb225-8ebd-4a43-ac18-71f7f8083b6a>

The city of Port Neches and Jefferson County lifted a voluntary evacuation order Thursday afternoon, less than 24 hours after residents who were displaced for days last week amid a fire and multiple explosions at a local chemical plant were again asked to leave their homes Wednesday night.

<https://www.texastribune.org/2019/12/05/port-neches-plant-explosion-prompts-evacuation-order-one-week-later/>

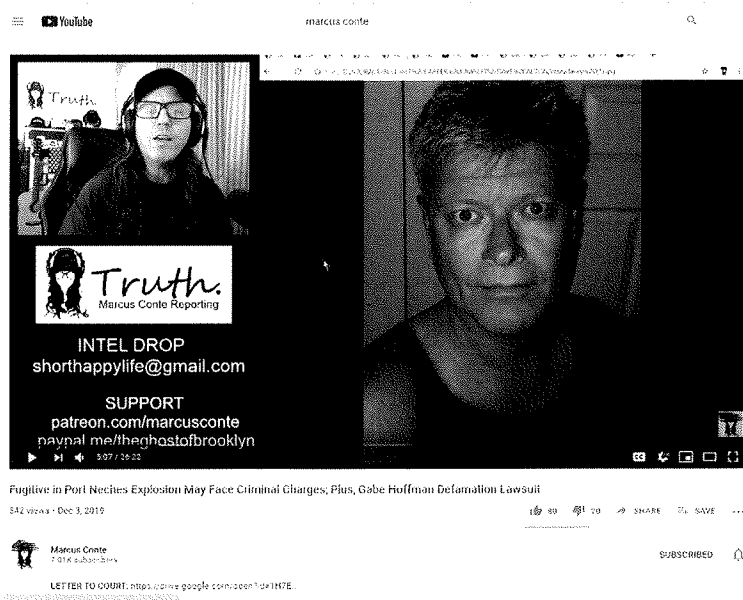
TPC Group is a leading producer of value-added products derived from petrochemical raw materials such as C4 hydrocarbons, and provider of critical infrastructure and logistics services along the Gulf Coast. Our products are sold into a wide range of performance, specialty and intermediate segments, including synthetic rubber, fuels, lubricant additives, plastics and surfactants. Headquartered in Houston,

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Texas, with an operating history of 75 years, TPC Group has manufacturing facilities in the industrial corridor adjacent to the Houston Ship Channel and Port Neches, Texas, and operates a product terminal in Lake Charles, Louisiana.

<https://www.tpcgrp.com/about>

38. In said video (above) Conte conflates again Thomas Schoenberger (former business partner of Chavez in SHADOWBOX STRATEGIES) and the Plaintiff and makes statements such as “they are on the run”, “crew of wandering criminals”, “they are gang-stalkers”, etc. Once again Conte uses an unauthorized photograph/likeness of the Plaintiff which has never been released publicly by the Plaintiff in any way or on any platform.



GENERAL ALLEGATIONS

39. The July 4, 2019 video podcast featuring Marcus Conte and Manuel Chavez, III is the most obvious lynch-pin connection between Def. Goodman, putative defendant Marcus Conte and non-party Chavez. Based upon the totality of evidence, reason and belief, it appears Chavez had a “change of heart” as claimed by the Def. Goodman in other court pleadings. Chavez publicly stated during this time that he wanted to help Jason Goodman with his lawsuit and that

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the Plaintiff and Thomas Schoenberger were “ganging up on Goodman”. Chavez appears to have coached Marcus Conte into discussing a well-developed narrative that involves the undersigned’s motives in suing Goodman merely for “placing his face on a coffee cup”.

40. This is the professional specialty of Chavez, creating smear campaigns and social media narratives to support the objectives of paying clients that are litigants in court proceedings (see Aaron Rich lawsuit and Virginia lawsuit) to create debilitating humiliation for opposing parties.

41. Debilitating humiliation as demonstrated by Justin “Woolee” Hess who killed his mother with an AR-15 semi-automatic rifle in Roswell, George on December 19, 2016. Justin Hess was a 30 y.o. social media minor celebrity who was the target of the same type of social media smear campaigns crafted by social media personalities that claim allegiance with Def. Goodman (see Montegraph and Agent19). The end result was a double homicide. Conte/Chavez share this vision as Chavez has made several public statements that the Plaintiff should “off himself”, a reference to suicide.

42. The Court should recall that it was Schoenberger (another alleged co-conspirator) that had created the entity known as **SHADOWBOX STRATEGIES** with Chavez in the fall of 2017 to deal with the publicity fall-out of the “Seth Rich murder” (Aaron Rich lawsuit). A more detailed explanation of these relationships is provided in **EXHIBIT FOUR** (attached). Suffice to say that Chavez is an expert at the manipulation of social media memes for paying clients (like Goodman and Ed Butowski). Chavez is talented in litigation perception management for clients paying up to \$20,000 in retainers (see Ed Butowski, Aaron Rich lawsuit).

43. The strongly held opinions expressed by Conte in the July 4, 2019 Chavez interview podcast are shared narratives used by **Def.** Based on the totality of evidence, reason and belief, it is alleged that Conte chose to adopt an aggressive and hostile attitude towards the undersigned as

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guided by talking points developed by **Def.** and Chavez. The Conte smear campaign against the undersigned began at this time (July 2019) and was endorsed, approved and guided by **Def.**

44. Based on the totality of evidence, reason and belief, it is alleged that during the time period of approximately June - July 2019 that Chavez recruited Conte to work on behalf of **Def.** Goodman. It was Chavez that provided overall smear messaging, allegations and other forms of disinformation to Conte to begin fashioning the smear campaign directed at the undersigned (beginning in July 2019), with the approval, endorsement and support of the **Def.**

45. The Court should note that the entire premise of “**SHADOWBOX STRATEGIES**” was to conduct smear campaigns (the more polite euphuism is “reputation defense”) and Chavez and Schoenberger were the primary partners in that enterprise. Both are experts at developing messaging conflating individuals with the accompanying narratives of “fugitive”, “psychopath”, “sociopath”, “criminal”, etc.

46. During this period of June - July 2019, and moving forward, Chavez, Conte and **Def.** formed a confederation, constellation and an association-in-fact to maintain logical connections between the Conte and **Def.** for the purposes of executing smear campaigns against the Plaintiff, to include allegations of criminal charges, acting as a terrorist, unethical activities, mental illnesses, etc. This “one hand washes the other” agreement allowed *alter ego* Conte (alleged joint tortfeasor) to develop video podcast content that would disparage, insult, defame, slander and inflict emotional distress upon the undersigned.

47. This plan is alleged to have been designed to alleviate Chavez’s legal liability in the Aaron Rich lawsuit and **Def’s** liability in this present lawsuit by creating debilitating humiliation of litigants. The aim of this confederation and association-in-fact was to reduce the legal liability of **Def.** Goodman (S.D.N.Y. lawsuit) and Chavez (Aaron Rich lawsuit) simultaneously.

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48. It is further alleged (as more fully explained in **EXHIBIT FOUR**) that Conte and Goodman developed a close social and personal relationship in the fall of 2017. Based upon the totality of evidence, reason and belief, it is alleged that Conte was a “designated driver drug dealer” operating on behalf of **Def.** Goodman to procure illegal street drugs – primarily cannabis. Conte offered Goodman a “legal firewall” to separate Goodman from the actual practice of purchasing these illegal street drugs in exchange for Goodman’s video podcast coverage of Conte’s legal proceedings with the Department of Sanitation – City of New York (**DSNY**). Therefore, *alter ego* Conte acted as Goodman’s procurement agent to obtain these drugs for the benefit of Goodman. This created a closer Goodman/Conte bond of association that developed into a joint tortfeasor relationship,

49. Due to the complexity of this situation, another key player (Denise Matteau of Corpus Christi, Texas) shall be sued in the U.S.D.C. for the Southern District of Texas. Matteau has shown herself to be a key player in developing the exact same messaging as parroted by Goodman, Conte and Chavez. For the purposes of judicial economy, claims against Ms. Matteau shall be prosecuted in Houston, Texas and not this forum. Ms. Matteau is described in ECF Doc. No. 90.

50. Denise Matteau acts as a “death cult” researcher and investigator on social media where she attacks the undersigned on nearly a daily basis. She also appears on the Conte social media podcasts to accuse Plaintiff and Thomas Schoenberger of being members of a blackmail, extortion, death cult, involved in cyber-stalking and gang-stalking, with criminal-level terrorism, etc. Matteau poses as a “death cult researcher” to accuse the undersigned on Conte’s podcasts. Matteau distributes the same conduct on her on YouTube and appears with Conte (see below).

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51. The linkages of Ms. Matteau to Chavez and Conte are even more overwhelming. The broadcast of nearly identical social media messaging directed at the undersigned is distributed uniformly by this group. To include the undersigned being called a psychopath, sociopath, criminal, fugitive, close associate of Schoenberger, gang-stalker, suffering from PTSD, was the “puppet master and mastermind” behind the Port of Charleston “dirty bomb hoax” in South Carolina on June 14th, 2017, etc. Nearly identical allegations of defamation *per se*, slander and libel are passed off by **Def.** Goodman, Conte and Chavez.

52. In the video entitled, “EXPOSING Online Death Cult Leaders; Dave Sweigert, Thomas Schoenberger and Daniel Cromer”, published 12/19/2019, accompanied with the video description, “Dave Sweigert, Thomas Schoenberger and Daniel Cromer are YouTubers known for developing trauma based video content to torment targeted individuals like Justin Hess who shot his 61-year-old mother, and Anthony Comello who murdered Frankie Cali the boss of the Gambino crime family. All three YouTubers are puppet masters of an online death cult. They recruit online followers that are groomed to carry out gruesome murders...” See below.

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EXPOSING Online Death Cult Leaders: Dave Sweigert, Thomas Schoenberger and Daniel Cromer

445 views · Premiered 4 hours ago

👍 55 🗨️ 14 ➦ SHARE 📌 SAVE ⋮

Marcus Conte
7K subscribers

SUBSCRIBED 🔔

53. Based upon the totality of evidence, reason and belief, Conte serves as an expendable forward line “attack dog” that can carry out anti-social behaviors against the undersigned while Def. Goodman maintains Aire of being on his best behavior and self-censoring his normal attacks during these S.D.N.Y. proceedings.

54. The intensity of Conte’s statements (“**And for that, that is unforgiveable**”) in July 2019 (immediately after interacting with Chavez the day before) seems unexplainable. Such veiled threats do not benefit Conte at all; however, they are of great benefit to Def. Goodman.

55. In sum, these types of social media attacks can be generally classified as litigation retaliation smear campaigns in which both Conte and Def. distribute with nearly identical and uniform messaging.

56. Manuel Chavez, in a dozen of social media videos, has boasted of his abilities as a smear campaign professional that develops social media messaging for the purposes of eliminating litigation opponents via debilitating humiliation (see SHADOWBOX STRATEGIS). It also serves the objectives of Def. Goodman to have Conte “shoe-horn”, “squeeze” or “force” the

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Plaintiff into the Virginia lawsuit conspiracy against Def. Goodman. Otherwise, it is difficult to understand the high degree of hostility exhibited by Conte in his July 4th, 2019 video podcast (**“And for that, that is unforgiveable”**).

57. The overlapping activities and occurrences of these events with the common individuals involved (Goodman, Conte, Chavez, Fougere, Schoenberger) creates a logical connection between Goodman and his *alter ego* Conte. Chavez provides the linkage between Goodman/Conte and Chavez has the requisite experience in smear campaigns (“reputation defense”) to develop messaging for Conte.

58. Meanwhile, Thomas Schoenberger is another linkage as Conte and Chavez fervently assert that the undersigned is working for, working with, paid by, compensated by, etc. with Schoenberger (which is all completely untrue). The conflagration of the undersigned with Thomas Schoenberger (with the accompanying “fugitive”, “criminal”, “psychopath”, etc.) is a uniform and constant line of attack and the guilt by association smear.

59. The foregoing named individuals – all of whom have had Conte and are part of the Def’s. “Virginia lawsuit conspiracy” are noted in the Def.’s “First Request for the Production o Documents”, (# 117). Para. 1 George Webb Sweigert, para. 2 Robert David Steele, para. 5 Steve Outtrim, para. 7 Thomas Schoeberger, para. 11 Marcus Conte, and para. 14 Dean Fougere. This creates more logical connections and commonality between claims against Def. and putative defendant Conte. Both Def. Goodman and Conte are joint tortfeasors.

SPECIFIC ALLEGATIONS

COUNT I: VIOLATIONS OF NEW YORK GENERAL BUSINESS LAW §§349-350 (CONSUMER PROTECTION ACT)

60. Plaintiff repeats, repleads and incorporates by reference each and every allegation of paragraphs 1 through 58 of this Complaint as though set forth in full herein. All of Defendant Conte's actions described have taken place in the State of New York.

61. As set forth above, Conte's representations, or practices, were (and continue to be) deceptive and likely to mislead consumers acting reasonably. These actions by Conte violate **N.Y. GENERAL BUSINESS LAW §§ 349-350**.

62. Conte relies on the foregoing described deceptive use falsehoods, lies, slander and libel to sensationalize events to drive traffic to the paid subscription service known as PATREON.COM. These activities have damaged the undersigned's business, trade and profession. Conte's misrepresentation and publication of falsehoods as an "investigative reporter" have caused severe emotional injury upon the Plaintiff who has suffered pecuniary and non-pecuniary damages as a result of Conte's actions.

63. **N.Y. General Business Law (GBL) states at § 349**, declares deceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service in New York state unlawful." [emphasis added]. "Whether a representation or an omission, the deceptive practice must be 'likely to mislead a reasonable consumer acting reasonably under the circumstances.'" *Stutman v. Chemical Bank*, 95 N.Y.2d 24, 29 (2000). Courts consider whether an act is deceptive objectively. *Boule v. Hutton*, 328 F.3d 84, 94 (2d Cir. 2003). Notably, the deceptive practice does not have to rise to "the level of common-law fraud to be actionable under

section 349.” *Id.*, citing *Gaidon v. Guardian Life Ins. Co.*, 94 N.Y.2d 330, 343 (1999). In fact, “[a]lthough General Business Law § 349 claims have been aptly characterized as similar to fraud claims, they are critically different.” *Gaidon*, 94 N.Y.2d at 343. For example, while reliance is an element of a fraud claim, it is not an element of a GBL § 349 claim. *Stuntman*, 95 N.Y.2d at 29; *Small v. Lorillard Tobacco Co.*, 94 N.Y.2d 43, 55-56 (1999).

64. Conte has met this standard of misconduct by the broadcast of his social media content that directly attacks the undersigned in a targeted fashion to create a false social media narrative for the purposes of infliction damage to the business, professional and technical reputation of the undersigned.

65. These reckless activities of Conte have created pecuniary and non-pecuniary injury to the undersigned and his business, technical and professional reputation and well as causing the undersigned to expend resources and time to address the slanderous falsehoods, lies and defamatory attacks. Conte’s malicious use of his social media advertising platform (used to attract subscribers to the PATREON paid service) have resulted in harm and injury to the undersigned. *Menaker v. C.D.*, 2:17-cv-5840 (DRH)(AYS) (E.D.N.Y. Nov. 1, 2018)

66. Conte’s “investigative reporter” reports on the progress of this litigation have been biased to the point of representing slanderous attack. Conte has led the public to believe that this legal action includes charges to be filed against the undersigned for “perjury”. Conte included the name of the presiding judge and her honor’s official e-mail address in communications (e-mail and postal mail) that create the false impression in the public’s mind that “perjury” charges have been filed against the undersigned.

67. These COUNT ONE claims are nearly identical to the COUNT ONE claims presented in the Second Amended Complaint (ECF Doc. No. 88) against Jason Goodman.

COUNT II: DEFAMATION AND DEFAMATION PER SE

68. Plaintiff repeats, repleads and incorporates by reference each and every allegation of paragraphs 1 through 66 of this Complaint as though set forth in full herein. All of Defendant Conte's actions described have taken place in the State of New York.

69. Conte's slanderous, libelous and defamatory *per se* allegations (inherently harmful) were directed specifically at the undersigned's business, trade, profession and were not framed as hyperbole. The epithets of Conte were stated as facts, which included accusations of criminal and unethical activity relating to the professional integrity of the undersigned. Conte "public alerts" in the tone of law enforcement "AMBER alerts" to create the unmistakable impression that the Plaintiff was a fugitive from justice and on the run.

70. Conte's slanderous statements (uttered and published) have (1) charged the undersigned with serious crimes, (2) that injured the undersigned's profession, business and trade, and (3) statements that imputed mental disorders upon the undersigned (loathsome disease).

71. Conte's "investigative reporter" reports on the progress of this litigation have been biased to the point of representing slanderous attack. Conte has led the public to believe that this legal action includes charges to be filed against the undersigned for "perjury". Conte included the name of the presiding judge and her honor's official e-mail address in communications (e-mail and postal mail) that create the false impression in the public's mind that "perjury" charges have been filed against the undersigned.

72. Conte published malicious "investigative reports" that include the broadcast of messages (e-mail and postal mail) sent to the magistrate judge that indicates that the undersigned will be charged with witness tampering. Conte creates the appearance of official communications with

this Court and the Federal Bureau of Investigation to claim the undersigned is under investigation.

73. In addition to the foregoing outlined above, Conte has (and continues) to make multiple material misrepresentations, or omissions, of fact, to the general public and specifically to the Plaintiff. Conte has distributed via his social media footprint that the Plaintiff is in a “criminal gang”, a “close associate” of Thomas Schoenberger, that Plaintiff threatened to blow up the Port Neches, Texas TPC plant, that Plaintiff is a “terrorist”, “gang-stalker”, “criminal harasser”, etc.

74. Conte has specifically transmitted in a widely distributed manner to his world-wide audience his false allegations that the undersigned is a terrorist, member of an extortion gang, member of a blackmail gang, member of a gang-stalking operations, has engaged in criminal harassment, has violated 18 U.S.C. § 1001 and 18 U.S.C. § 1512 (b), works for Thomas Schoenberger, cooperates with Schoenberger, is a fugitive with Schoenberger, etc.

75. These COUNT TWO claims are nearly identical to the COUNT TWO claims presented in the Second Amended Complaint (ECF Doc. No. 88).

COUNT III: VIOLATIONS OF CIVIL RIGHTS LAW § 50 and 51

76. Plaintiff repeats, repleads and incorporates by reference each and every allegation of paragraphs 1 through 74 of this Complaint as though set forth in full herein.

77. The putative defendant Conte’s actions described above and herein have taken place in the State of New York.

78. Conte has abridged the undersigned’s right of privacy by the unauthorized use of Plaintiff’s name, portrait or picture for commercial purposes pursuant to New York Civil Rights Law § 50.

Civil Rights Law § 50. Right of Privacy

“A person, firm or corporation that uses for advertising purposes, or for the purposes of trade, the name, portrait or picture of any living person without having first obtained the written consent of such person, or if a minor of his or her parent or guardian, is guilty of a misdemeanor. “

79. Conte has used the likeness of the undersigned to embarrass, harass, humiliate and injure the undersigned. There is no news-worthiness, editorial rationale or any other journalistic endeavor that would justify this type of use. To include bizarre distortions of the undersigned’s likeness (which remains recognizable as the undersigned) indicates malicious motive. That the use of the photograph/likeness of the undersigned was done so in a malicious manner to intentionally inflict great emotional distress upon the Plaintiff for malicious purposes.

80. *New York Civil Rights Law § 51. Action for Injunction and for Damages* provides for a private right of action against such abuses of portraits, photographs and images on non-related parties to news events. Section 51 provides a claim for an injunction and damages in favor of "[a]ny person whose name, portrait, picture or voice is used within this state for advertising purposes or for the purposes of trade without . . . written consent . . .". The undersigned has never given written consent to Conte to use his image/likeness. The image used by Conte was never released to the public, was never posted on a Facebook, MySpace or other such social media platforms by the undersigned. The photograph depicting the undersigned in a green “muscle shirt” (aka “wife beater” shirt) was original sent via private, encrypted point-to-point cell phone message transfer to only one party. This photograph was never released to any public social media platforms and was sent to one single party in a point-to-point fashion. For unknown reasons, the single individual recipient of the “wife beater” photograph released it within a Twitter “tweet”. This release was not authorized by the undersigned – whose likeness the

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photograph displays. This further represents an invasion of privacy by Conte to misuse and disseminate the plaintiff's photograph in an unauthorized manner for the purposes of injuring, harming and harassing the undersigned. It is believed Conte's motive is to identify the Plaintiff to help facilitate physical attacks upon the undersigned which have caused him to fear for his safety.

81. Although Sections 50 and 51 have different enforcement schemes they both protect against "nonconsensual commercial appropriations of the name, portrait or picture of a living person." *Finger v. Omni Publ'ns. Int'l, Ltd.*, 77 N.Y.2d 138, 141 (1990)

82. Pursuant to Section 51 the undersigned claims and alleges that Conte, himself or via his companies and businesses, (1) used Plaintiff's name, portrait, picture and voice (2) for advertising and trade purposes, (3) without written consent. Examples are shown below.

83. It should be noted that the dozen or so videos directed at the Plaintiff include social media "thumbnails", or miniature teaser photos that act as a visual label for the video. The Plaintiff's unauthorized, private photograph/likeness appears in most of these videos, with the Plaintiff's full legal name, as seen below.

SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - SDA**Marcus Conte**

7.01K subscribers

HOME

VIDEOS

PLAYLISTS

COMMUNITY

CHANNELS

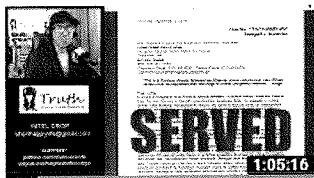
ABOUT

sweigert

**THE STING: Dopey Dave Acton Sweigert Takes The Bait**

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**Dave Acton Sweigert Charged With Cyber Bullying, Harassment, Perjury: SDNY Judge Valerie E. Caproni**

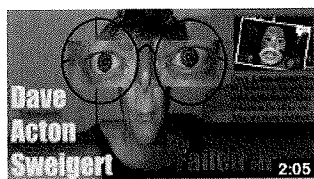
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LETTER TO JUDGE <https://drive.google.com/open?id=1GNH5Wkf7rivxFBaZpiao1dckwSpCIV4p> Marcus Conte Reporting... <https://patreon.com/marcusconte> <https://paypal.me/theghostofbrooklyn>

**Dopey Dave Sweigert The Failed Actor Who Sues People**

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**ALERT: 'Child Exploitation' Video Promoted by Dopey Dave Sweigert**

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California's obscenity laws protect children from exploitation in pornographic materials. Laws against child pornography prohibit and punish the production, possession, transport, distribution, and...

**Exploring Frivolous LARP lawsuit D. GEORGE SWEIGERT v. JASON GOODMAN - SDNY 18-CV-8653**

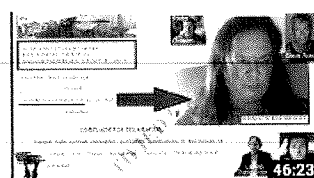
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"This is a frivolous dispute between two litigants whose voluminous court filings rehash their incomprehensible and illogical online conspiracy theories." -HON VALERIE CAPRONI

**Dealing With Cyber Bullies; Dopey Dave Acton Sweigert Under FBI Review [LARP NEWS]**

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**LARP NEWS: Grifter Thomas Schoenberger Sued; Steve Outtrim, Dean Fougere, Dave Sweigert, Dan Cromer**

Marcus Conte • 809 views • 1 month ago

This video is 46:22 in length, prerecorded. Read the amazing Gabe Hoffman Lawsuit:
<https://drive.google.com/file/d/1HHJrQEIJMYLxrbDbxcCzAl4teBqzMyr/view?usp=sharing> Marcus

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LARP NEWS: Future Shooter Titus Frost [Dean FOUGERE] Works for Dave Acton SWEIGERT et al
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Top 2 Cat Ladies on Youtube; Dopey Dave Acton & The Tooth Fairy
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 Dopey Dave Acton Sweigert <https://www.youtube.com/user/ActontheActor> Tooth Fairy Denise Matteau
<https://www.youtube.com/channel/UCRkaQpn6MdoksEuU4H-TY0w> Marcus Conte Reporting...



RAW Call To FBI "Rogue YouTuber Reported to FBI for Explosion in Port Neches TX"
 Marcus Conte · 1.1K views · 2 weeks ago
 Called placed to FBI 11/27/2019 12:10 pm EST reporting D. George Sweigert / Dave David Acton 'terrorist' video Marcus Conte Reporting... <https://patreon.com/marcusconte>

84. These COUNT THREE claims are nearly identical to the COUNT THREE claims presented in the Second Amended Complaint (ECF Doc. No. 88).

COUNT IV. NEGLIGENCE AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

85. Plaintiff repeats, repleads and incorporates by reference each and every allegation of paragraphs 1 through 83 of this Complaint as though set forth in full herein.

86. All of Conte's actions described above and herein have taken place in the State of New York.

87. This section should be construed as two separate causes of action: NEGLIGENCE and INTENTIONAL infliction of emotional distress.

NEGLIGENCE INFLICTION OF EMOTIONAL DISTRESS

88. Conte's publication, world-wide distribution and wide dissemination of the Plaintiff's image, name, with the accompanying video content have caused the undersigned distress that has

manifested physically in the way of lack of sleep, headaches, muscle soreness, anxiety and nervousness. These manifestations are direct result of Conte's public descriptions of the Plaintiff is a "fugitive on the run", may be held liable for "explosions at Port Neches, Texas", is an associate of Thomas Schoenenberger, is a "criminal gang-stalker", "has committed perjury", has violated 18 U.S.C. § 1001 and 18 U.S.C. § 1512 (b), should be arrested for "witness tampering", has mental illness, is a "psychopath" and "sociopath" etc. The foregoing statements by Conte have caused the undersigned severe emotional distress.

89. Conte owed a duty to the Plaintiff to comply with New York State law that provided protection of the undersigned's private photograph that was used by Conte in an unauthorized manner. Conte unreasonably endangered the undersigned's physical safety and caused the undersigned to fear for his physical safety.

90. This can be classified as a "garden-variety I.I.E.D." claim for the convenience of the Court.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (I.I.E.D.)

91. Conte owed the Plaintiff a statutory duty of complying with New York state law, see N.Y. General Business Law and Civil Rights Law (previously mentioned). Conte failed to comply with these laws (after several attempts by Plaintiff to obtain compliance). Further, Conte was aware of this instant litigation and it is assumed he read the Second Amended Complaint (ECF Doc. 88) and therefore knew his actions were reckless, wanton and were carried out regardless to the truthfulness of the accusations.

92. That Conte's conduct against the Plaintiff was extreme and outrageous conduct that caused the undersigned severe emotional distress. Conte's misconduct has gone beyond all

reasonable bonds of decency and should be regarded as atrocious and utterly intolerable in civilized society.

93. As discussed later, Conte intentionally initiated investigations with the Federal Bureau of Investigation in a malicious manner. Without probable cause, Conte accused the undersigned of various crimes for the purposes of broadcasting such telephone calls to his social media audience, without any consideration as to the impact on the undersigned.

94. Conte's actions were intentional and deliberate and were highly offensive in their nature, which would shock the conscience of a reasonable person. Conte's actions were (1) extreme and outrageous conduct, (2) intent to cause severe emotional distress, (3) a causal connection between the conduct and the injury, and (4) severe emotional distress." *Bender v. City of New York*, 78 F.3d 787, 790 (2d Cir. 1996).

95. The reckless conduct of Conte significantly harmed and injured the undersigned's career and future business opportunities causing distress and emotional angst to the undersigned. These are not accidental inclusions of the undersigned's name and likeness in trade productions that have no newsworthy value. These were intentional and targeted attacks on the business reputation, ethical and professional / technical reputation of the Plaintiff and were designed to inflict the highest degree of emotional damage and distress.

96. Conte's conduct was intentional and was (1) extreme and outrageous conduct, (2) intended to cause severe emotional distress, (3) such distress was a direct and proximate cause of Defendant's actions, and (4) severe emotional distress was the result. *Bender v. City of New York*, 78 F.3d 787, 790 (2d Cir. 1996).

97. The publication of the Plaintiff's image and name in context of criminal acts and ethical breaches is conduct so outrageous in character, and so extreme in degree, as to go beyond all

possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized society. See *Martin v. Citibank, N.A.*, 762 F.2d 212, 220 (2d Cir. 1985).

98. This can be classified as a “garden-variety I.I.E.D.” claim for the convenience of the Court.

99. These COUNT FOUR claims are nearly identical to the COUNT FOUR claims presented in the Second Amended Complaint (ECF Doc. No. 88).

COUNT V. CIVIL CONSPIRACY

100. Plaintiff repeats, repleads and incorporates by reference each and every allegation of paragraphs 1 through 97 of this Complaint as though set forth in full herein.

101. All of Conte’s actions described above and herein have taken place in the State of New York.

102. It is alleged that Conte is a joint tortfeasor along with Defendant Jason Goodman to injure, harm, distress, harass and create emotional distress for the undersigned. ... It is clear that where defendants are alleged to be jointly liable, they may be joined under Rule 20 because the transaction-or-occurrence test is always satisfied. See *Temple v. Synthes Corp.*, 498 U.S. 5, 7, 111 S.Ct. 315, 112 L.Ed.2d 263 (1990) (per curiam) (noting that a joint tortfeasor is a permissive party).

103. Conte agreed with Def. Goodman to commit overt acts to further a conspiracy that shared the objectives to cause harm, distress, financial loss, and other torts against the undersigned. Conte agreed to act as Def. Goodman’s *alter ego* for the purposes of distributing and broadcasting outrageous falsehoods against the undersigned, to include the transmission of mail (e-mail and postal mail) to the jurists assigned to this lawsuit.

104. In doing so, Conte created video content that indicated the undersigned was a criminal, terrorist and fugitive by relying on identical federal laws and allegations proffered by Def.

Goodman to make false allegations against the undersign; such as 18 U.S.C. § 1001.

105. Conte distributed his video content as an overt act of this conspiracy to defame, harm, injure and cause unnecessary alarm by the undersigned to fear for his safety. Both Conte and Def. Goodman agreed to take actions to defame and injure the Plaintiff to further their agreement. These overt acts included the release of Conte's video content and Conte's unauthorized communications to the jurists assigned to this lawsuit (via e-mail and postal mail),

COUNT VI: MALICIOUS PROSECUTION

106. Plaintiff repeats, repleads and incorporates by reference each and every allegation of paragraphs 1 through 102 of this Complaint as though set forth in full herein.

107. All of Conte's actions described above and herein have taken place in the State of New York.

108. Conte has telephoned the Federal Bureau of Investigation on several occasions to initiate criminal proceedings against the undersigned. Mr. Conte advised law enforcement agents that the undersigned was actively committing crimes related to terrorism and threatening the safety of critical infrastructure (the Port Neches, Texas TPC factory explosion attributed to the undersigned). The objective of these telephone calls was to have a law enforcement agency initiate a criminal investigation against the undersigned.

109. As Conte is a former enforcement officer for the Department of Sanitation of New York (DSNY) he had the requisite knowledge of understanding probable cause. Conte knew, prior to making these telephone calls, that he could not articulate a reasonable suspicion against the Plaintiff, which is a weaker element than probable cause. Having no reasonable suspicion or

probable cause, nevertheless, Conte indicated to law enforcement that the plaintiff was engaged in criminal conduct, “was a known terrorist” and had threaten to “blow up” a port in Texas. Conte (undersigned specifically linked by Conte with the explosions at the TPC factory in Port Neches, Texas).

110. Conte engaged in these telephone calls to law enforcement out of his pure personal animus and malice directed at the undersigned (**And for that, that is unforgiveable.** Alright?). The publication of the distorted photographs of the undersigned indicates a severely malicious attempt to inflict emotional distress on the undersigned and indicates that the motive for telephoning law enforcement personnel in malicious in nature. Lacking probable cause and reasonable suspicion, Conte was so motivated by malice and personal animus, that he nevertheless, proceeded ahead in reckless disregard for the impact such activities would have on the undersigned.

111. A claim for malicious prosecution under New York state law requires “(1) the initiation or continuation of a criminal proceeding against the plaintiff; (2) termination of the proceeding in plaintiff's favor; (3) lack of probable cause for commencing the proceeding; and (4) actual malice as a motivation for defendant's actions.” Manganiello, 612 F.3d at 161 (quoting Murphy v. Lynn, 118 F.3d 938, 947 (2d Cir.1997)) (internal quotation marks and citation omitted); see Alcantara v. City of N.Y., 646 F.Supp.2d 449, 457 (S.D.N.Y.2009).

DAMAGES

112. The Plaintiff has personally suffered damages in his person and his business as a direct and proximate result of Conte for which an appropriate private civil remedy is unavailable.

113. Conte willfully and knowingly committed deceptive acts and unlawful practices in violation of General Business Law 349, entitling the Plaintiff to treble damages.

114. Damages include undersigned's claim for mental anguish, loss of reputation, humiliation, mental anguish and damage to trade, profession and business, ridicule in the Internet community.

115. These horrible Conte social media productions, that include the perverted images of the Plaintiff are presented as "news broadcasts" by an "investigative reporter" based upon "sources, research and evidence". At best, Conte's false allegations rely on fabricated sham speculation, malformed violations of "criminal law", etc. which is presented to an astounding audience reach, with insinuations and statements as if fact that the undersigned is are involved in a criminal network directed at attacking "journalists" like Conte.

116. Conte is fond telephoning the F.B.I. to report the undersigned for various crimes, which do not rise to the level of probable cause. In sum, Conte's "news reports" are a sham and warped charade which is continually updated for consumers within the public at large. The end goal is to collect more easy money via fund-raising while simultaneously (1) destroying innocent potential critics and (2) amplifying the alarmist "deep state" "fear porn" narrative du jour (e.g. "gang-stalking", "fugitive", "criminal gang", etc.).

117. Conte commits acts of defamation *per se*, trade libel and slander of innocent third parties -- like the Plaintiff -- aimed at maintaining the continuity of collecting fund-raising proceeds for Conte via PATREON and other credit card processors. This is a continuing, open-ended and repetitive pattern that shows no signs of ceasing.

118. The Plaintiff claims that due to the actions of Conte that (1) he has personally suffered actual and threatened injuries to his profession and business, (2) that these injuries can be traced

to the activities of the Conte's misconduct and (3) that his injuries are likely to be addressed by a favorable outcome of this present case at bar.

119. In various forms the Defendant has alluded to the Plaintiff's alleged nefarious activities as a so-called "member of a criminal gang-stalking network", "fugitive from justice", "terrorist" and suspect in the Port Neches "bombing", to name a few.

120. As a formality the Plaintiff DENIES all the above assertions, allegations and insinuations made by Conte.

121. The Plaintiff has a property right interest in his reputation, publicity concerning his work products, maintaining his ability to publish technical reports, etc. The Plaintiff's compensable injury necessarily is the harm caused by the Conte, to include pecuniary and non-pecuniary damages.

PRAYER FOR RELIEF

122. The Plaintiff seeks all equitable and punitive damages to be made whole and all other relief as this Court deems appropriate. Such relief as is necessary to end the smear and shame campaign directed towards the Plaintiff by Conte.

123. Declaring that Conte has violated the privacy rights of the undersigned by his unauthorized use of the Plaintiff's likeness/photograph and that Conte has incurred liability for doing so.

124. Ordering Conte to immediately remove all social media video content that contains the Plaintiff's likeness in any way; to include photographs, composite photograph, "mash-ups", distorted photographs and all other such likenesses of the Plaintiff.

125. Granting such other and further relief as the Court deems appropriate.

JURY TRIAL DEMANDED

126. The undersigned demands a jury trial.

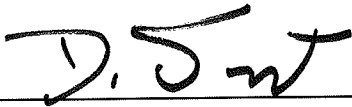
ATTESTATION

The undersigned hereby attests that all exhibits are accurate and true reproductions of their source appearance (from Internet web-sites, e-mail messages, etc.). The undersigned hereby attests that the foregoing statements have been made under penalties of perjury.

STATEMENT AND VERIFICATION

This pleading is true to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believe are true. See NY C.P.L.R. 3020.

Signed under penalty of perjury,

 /

**D. George Sweigert,
c/o General Delivery
Rough and Ready, CA 95975
Spoliation-notice@mailbox.org**

12.19.19

STATEMENT AND VERIFICATION

This pleading is true to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believe are true. See NY C.P.L.R. 3020.

D. Swartz
12.19.19

EXHIBITS

EXHIBIT ONE

Thursday, September 12, 2019

**Case No. 1:18-CV-08653-VEC
Sweigert v. Goodman**

Hon. Valerie E. Caproni [Via Email and USPS First Class Mail]
United States District Judge
Thurgood Marshall United States Courthouse
Courtroom: 443
40 Foley Square
New York, NY 10007
Chambers Phone: (212) 805-6350 - Deputy Phone: (212) 805-6355
CaproniNYSDChambers@nysd.uscourts.gov

"This is a frivolous dispute between two litigants whose voluminous court filings rehash their incomprehensible and illogical online conspiracy theories." -Judge

Dear Judge,

It is hard to imagine a more frivolous dispute between 2-crackpot online conspiracy theorist than this one. Not only is Plaintiff a documented conspiracy kook, he engages in routine online Cyber Bullying, Harassment & Perjury. My name is Marcus Conte, an independent journalist, whistleblower and YouTube personality familiar with both party's on & offline shenanigans. I am also one of plaintiff's many Cyber Bully victims. I would like to place my personal experience on the record. I live in Brooklyn NY and would be willing to come to court and give sworn testimony.

In my enclosed 1-hr public **YouTube** video everything I am offering here will make perfect sense. Please watch the video titled: **"Dave Acton Sweigert Charged With Cyber Bullying, Harassment & Perjury Before SDNY Judge Valerie E. Caproni 1:18-CV-08653-VEC"**
<https://youtu.be/cWTikLjJXX4>

Plaintiff Dave Sweigert is a YouTube video celebrity with a subscriber base of 17,000 viewers. However, Sweigert falsely claims he is a 'private citizen.' He is not. Sweigert is a well-known 60-year old public figure on a fishing expedition to smear his online competitors like myself, and, the Defendant Jason Goodman. Sweigert does all of this for his own personal gain. Though Goodman is far from a saint, Sweigert falsely claims he was defamed, slandered and libeled by Goodman; Sweigert claims he suffers from mental anguish, loss of reputation, damage to trade, profession and business, ridicule in the community and medical injuries to his musculoskeletal system. Nothing could be further from the truth. In fact the opposite is true - Sweigert has prospered from the situation. Sweigert is a documented narcissist who enjoys tormenting people through online video making. His allegations of defamation are so ridiculous because as you will see in the above video Mr. Sweigert knowingly & willfully attempts to inflict all of those damages on others; including this reporter.

1. Sweigert commits perjury against the Court because he is deliberately misleading the Court about his Public online presence & nefarious engagement. As a Pro Se litigant, all of his written statements thus far are his sworn testimony.

18 U.S.C. § 1001(a):

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

(1) falsifies, conceals, or covers up by any trick, scheme, or device[,] a material fact;
(2) makes any materially false, fictitious, or fraudulent statement or representation; or
(3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry
shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331),[11]
imprisoned not more than 8 years, or both....

2. Sweigert commits Cyber bullying and repeated harassment against this Reporter as demonstrated in the video **"Dave Acton Sweigert Charged With Cyber Bullying, Harassment & Perjury Before SDNY Judge Valerie E. Caproni 1:18-CV-08653-VEC"**

CONCLUSION

Plaintiff is no "knight in shining armor." He is an online menace and should be barred by the court from online discourse and from further discussing this case in public. Plaintiff should also be severely fined for filing one frivolous motion after another at the expense of the People, and for making a mockery of this court - and this country.

Respectfully,

MARCUS CONTE
199 Gelston Ave, Apt D1
Brooklyn NY 11209
shorthappylife@gmail.com

CC: Jason Goodman, Dave Sweigert
[Via Email and USPS First Class Mail to last known address]

EXHIBIT TWO

Tuesday, December 3, 2019

TO:

STEWART D. AARON, UNITED STATES MAGISTRATE JUDGE

Aaron_NYSDChambers@nysd.uscourts.gov

CaproniNYSDChambers@nysd.uscourts.gov

PRO SE DIVISION, ROOM 200

U.S. District Court

Southern District of New York (Foley Square)

500 Pearl Street

New York, N.Y. 10007

Case No. 1:18-CV-08653-VEC Sweigert v. Goodman

Dear Judge,

My name is Marcus Conte, a YouTube Journalist. This notice is to inform the court that D. George Sweigert [Plaintiff] has willfully and repeatedly engaged in Witness Tampering in violation of 18 U.S. Code § 1512 (b). On Thursday, September 12, 2019 I sent a letter to Hon. Valerie E. Caproni informing her I was a victim of cyber bullying by the Plaintiff. In this regard I made myself available as a character witness against the Plaintiff. All parties were notified. Since then, Plaintiff has ramped up his harassment, threats of frivolous litigation, stalking & bullying against me in a series of even creepier YouTube videos to prevent me from appearing. More than 47 times Plaintiff has incorporated my name into his incomprehensible, illogical and now dangerous death-cult videos. His latest video, which appeared on his misleading "I-LUV-SDNY" YouTube channel was published on 11-25-19 and was viewed by his 17,000 subscribers. 2-days later on 11-27-19 there was a massive chemical explosion in Port Neches TX that had a striking resemblance to the 'dream' Plaintiff claims he had in that video. This 'remarkable coincidence' gained national attention and was reported to the FBI. The cause of the blast is still unknown.

"I had a dream" By D. George Sweigert

<https://drive.google.com/file/d/1NDVoSQOJwHa5giD3bfVzOTkSjFYdgzXf/view>

In this very real video Plaintiff frames Defendant Jason Goodman & myself as kidnappers in a domestic terror operation that use a flame-throwing drone to blow up LNG tanks in the Port of Corpus Christie TX. Plaintiff paints himself as 'the knight in shining armor' who captures the perpetrators and prevents the attack from happening. The third person in the video, or the women who was kidnapped is reporter Denise Matteau of Corpus Christie

who is also named as a witness in this case. Then, on 12-02-19 Plaintiff publishes a hit-piece on his deceptive website <http://SDNY.org> suggesting I was responsible for some sort of 'hoax.' In his report Plaintiff accuses me of the crime of reporting a crime. Plaintiff is so twisted in his delusions he does not even understand it is NOT a crime to report a crime, but rather a civil duty. Here is his 'report':

Written & published by D. George Sweigert
<https://sdny.news/2019/12/02/religious-crack-pot-and-nyc-satanist-team-up-to-spread-bombing-hoax-of-port-neches-texas/>

Moreover, it should alarm this court that Plaintiff has created a web page that pretends to serve as an information portal to a Federal court [<http://SDNY.org>]. Plaintiff has no authority whatsoever to host such a site. Plaintiff not only remains a troublemaker and a threat to everyone he encounters on YouTube, but now he corrupts the very integrity of this court. As well, Plaintiff continues to threaten others and myself with frivolous litigation. I am often scared for my safety and if it wasn't for the fact that Plaintiff has no published legal address, I would place a restraining order on him today. He is a very intimidating person. Here is the law I believe he is in violation of at least 24 times:

18 U.S. Code § 1512. Tampering with a witness, victim, or an informant

(b) Whoever knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—

(1)

influence, delay, or prevent the testimony of any person in an official proceeding;

(2) cause or induce any person to—

(A)

withhold testimony, or withhold a record, document, or other object, from an official proceeding;

(B)

alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;

(C)

evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding;
or

(D)

be absent from an official proceeding to which such person has been summoned by legal process; or

I am in possession of 47 defamatory videos made by Plaintiff directed at me: 23 were made BEFORE announcing myself as a witness and 24 were made AFTER announcing myself as a witness. All videos are available upon request. I do hope this communication stops Plaintiff from harassing others and abusing the legal system as he has been doing. I also hope the court will levy severe punitive sanctions on Plaintiff in an effort to correct his behavior.

Sincerely,

MARCUS CONTE
199 Gelston Avenue, D1
Brooklyn NY 11209
shorthappylife@gmail.com

CC:

D. George Sweigert - spoliation-notice@mailbox.org
Jason Goodman - truth@crowdsourcethetruth.org

Also see:

Domestic Terrorism NOT Ruled-out In Port Neches Texas Chemical Explosions <https://youtu.be/FZEJ9IV3tXs>

Rogue YouTuber Reported to FBI for Explosion in Port Neches TX
<https://youtu.be/e-ZGobNjEY>

Dave Acton Sweigert Charged With Cyber Bullying, Harassment, Perjury:
SDNY Judge Valerie E. Caproni <https://youtu.be/cWTikLjJXX4>

EXHIBIT THREE

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

D.G. Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211
Spoliation-notice@mailbox.org

July 11, 2019

Jason Goodman, CEO
Multimedia Systems Design, Inc.
252 7th Avenue
Suite 6-S
New York, NY 10001

Clerk of the Court, Room 3000
U.S. District Court
701 E. Broad St.
Richmond, VA 23219

MATTER: **STEELE v. GOODMAN, 17-CV-00601-MHL**
District Judge M. Hannah Lauck

SUBJECT: **PART ONE: ATTEMPTED FRAUD ON THE COURT BY
DEFENDANT GOODMAN VIA ECF DOC. NO. 139**

REF: (a) **MANUAL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834**

Good Morning:

1. This letter addresses the false misrepresentations that you continue to present to this honorable Court based on insufficient evidence that has been created with the cooperation of your CrowdSource The Truth (CSTT) side kick, see ref: (a), known as “DEFANGO”.

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

2. Your attention is kindly directed to ECF Doc. No. 139, para. 20, shown below.

24 key memes propagated by various internet-based sources.
25 20. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor
26 Application D. George Sweigert, telephone Manuel Chavez III, making substantially the
27 same claim, falsely stating that Defendant Goodman was paid by Black Cube
28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 11

Case 3:17-cv-00601-MHL Document 139 Filed 07/08/19 Page 12 of 119 PageID# 2376

1 (<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former
2 Mossad agents and operatives, according to their own public website.
3 21. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal

3. There are other issues associated with your ECF Doc. No. 139, para. 20 (see above). Amongst these legal insufficiencies, (i) whether or not the purported evidence you propound rises to the level of sufficiency in the light of the Federal Rules of Evidence, and (ii) your use of hearsay to attempt to attribute comments to the undersigned made by ref: (a) (DEFANGO) about Black Cube (as broadcast in the video you have described as EXHIBIT I, to ECF Doc. No. 78).

4. The enlarged video screen-shot from the above video content demonstrates that the source of the "Black Cube rumor" was apparently Matt Couch – and NOT the undersigned as you continuously report. As discussed in the previous letter on this subject, dated June 30th, 2019, you have implicated the undersigned as the source of the "Black Cube" rumor. To refresh your memory the rumor states that you and Laura Loomer were being paid by a Black Cube operative, stated by ref: (a) (DEFANGO) and NOT by the undersigned.

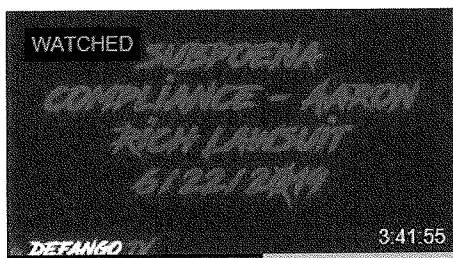
UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

5. Please take note of the following litigation in which ref: (a) is a witness:

**U.S. District Court
for the District of Columbia
RICH v. BUTOWSKY et al
CASE #: 1:18-cv-00681-RJL
Judge Richard J. Leon**

6. In recent YouTube video productions distributed by ref: (a) (DEFANGO) it has been clearly stated by ref: (a) that it is his that he was a member of a group of “reputation protection” operatives allegedly directed by Matt Couch (defendant in the above cited action). Ref: (a) has distributed in a widely pervasive manner, electronic messages from Matt Couch to support his testimony. Ref: (a) has also been vocal about evidence that he has furnished to you as well. See below:



subpoena compliance - Aaron Rich Lawsuit -
defango tv 6/22/2019

Defango TV

Streamed 1 week ago • 1,632 views

Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's ...

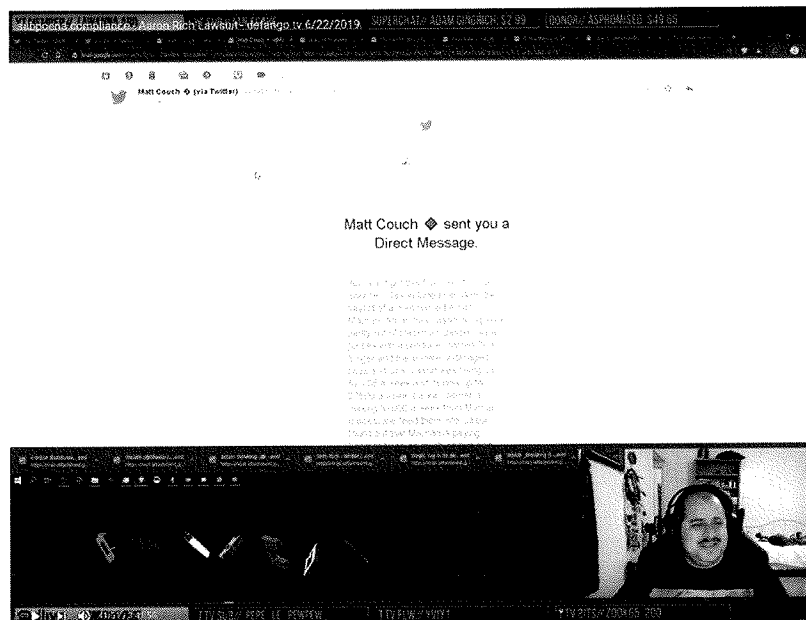
Streamed live on Jun 22, 2019

Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's for Court Records and whatnot. So we are getting everything on the table and building the files to FTP to the Lawyer. Any striking or anything is going to be interfering with a federal case.

Internet URL: <https://www.youtube.com/watch?v=pB7NjF1ApZg&t=7427s>

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



Matt Couch ♦ sent you a
Direct Message.

You didn't get this from me from a
Source Jason Goodman is on the
payroll of a man named Arman
Milchan Arman has Jason doing work
partly out of blackmail Jason was at
parties with a producer named Brian
Singer and there were underaged
boys and girls Jason was being paid
\$2,788 a week and its now up to
\$3500 a week Laura Loomer is
making \$7000 a week from Milchan
Black Cube feed them info Jason
found out that Milchan is paying

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

do not tell anyone how you got this info. Goodman's job is to deflect attention from Rahm Emanuel. Chuck Schumer and DWS. Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away. The money came from Israel. The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin. Now Milchan works with a guy named Avi Hersch. I know you and T and others know some of this stuff, but now you know the full story. Also, Alan Dershowitz has over 7 hours of Orgy Island vid hidden and his vid file is called Insurance, the same name as Schumer's boy Anthony Wiener. Please keep my name out of this. I focus on Vegas and **Seth**. But this is blow away stuff. Goodman will freak when you expose this. It comes directly from a CIA guy on our team.

7. As you can see by the above evidence, Matt Couch was the source of this "Black Cube" rumor. This rumor was distributed by ref: (a) (DEFANGO) on his own volition. The undersigned has nothing to do with the promulgation of this "Black Cube" rumor. The reverse is true, the entire matter was the sole responsibility of ref: (a), who is your CSTT side-kick. Your insinuations in ECF Doc. No. 139, para. 20 are false and an example of your unrelenting fraud.

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

8. Recall that the offending “Black Cube” rumor remarks were made by ref: (a) in EXHIBIT I (no. 9 in ECF) of ECF Doc. No. 78, which is cited by you in para. 30 of ECF Doc. No. 139 (video entitled *11.25.17.Solving.rar*). These remarks were NOT made by the undersigned.



Streamed live on Nov 25, 2017
Long day of puzzling and work

Internet URL: <https://www.youtube.com/watch?v=jK73oCxCGOE&t=4363s>

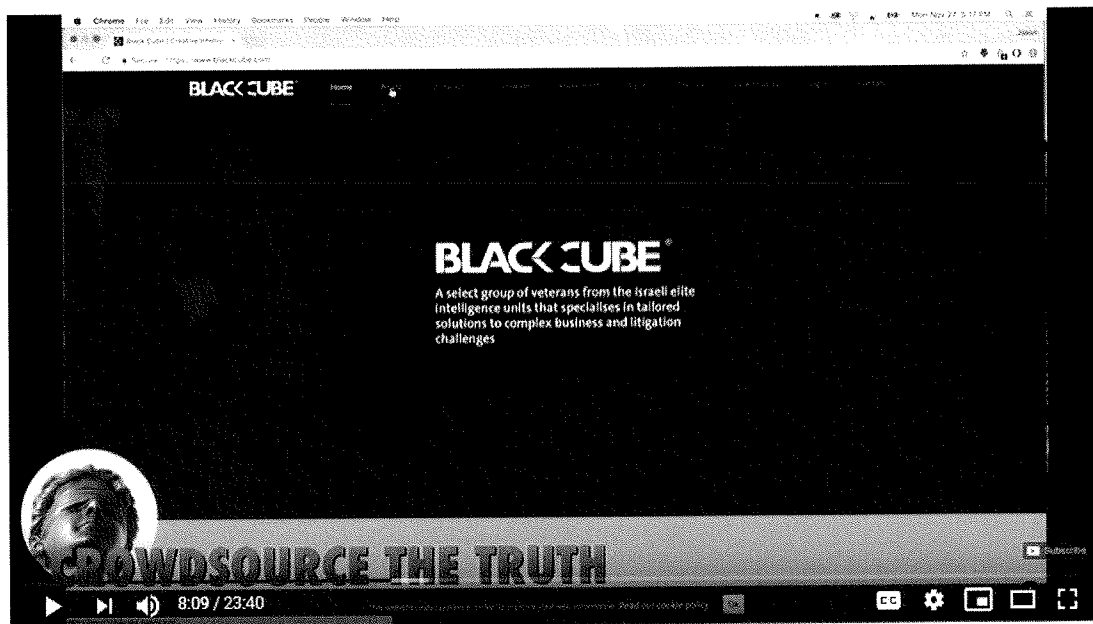
UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

9. These are the Black Cube rumor remarks that you have incorrectly attributed to the undersigned in a fraudulent manner. A transcript appears below.

REF: (A). 01.12.22. It's really crazy to me too .. I was picking up on something .. uh .. **Black Cube**. And, like I had gotten some information about . like .. some information from quote unquote "CIA source" that was talking about how Loomer and – what's his name – **Goodman were getting paid by some Black Cube, some Black Cube operative**. And then it started clicking in my head.
[emphasis added]

10. It is instructive to note that you specifically featured the Black Cube corporate web-site in your video production distributed in a widely pervasive manner two (2) days after these Black Cube rumor remarks were made public by ref: (a) on 11/25/2017 (see below).



Deep State Dunces Attack George Webb & CSTT - Bitcoin Challenge Response

15,317 views

672 126 SHARE SAVE ...

Jason Goodman

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



Deep State Dunces Attack George Webb & CSTT
- Bitcoin Challenge Response

Jason Goodman

Streamed 1 year ago • 15,315 views

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering ...

Streamed live on Nov 27, 2017

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering no evidence to support their claims.

Internet URL: <https://www.youtube.com/watch?v=GNxCk6nqFJg>

11. Below is a transcript of your comments as recorded in the above cited video.

GOODMAN. 07:57. They'll put out a video that where they'll say 'oh year, Jason Goodman is working for **Black Cube**. Now I will tell you something. I had no idea what Black Cube was, before these guys made a video about it.

[emphasis added]

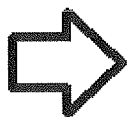
12. It appears you have intentionally conflated the undersigned with ref: (a) (DEFANGO) in a fraudulent manner to support the Black Cube narrative. In spite of overwhelming evidence that this rumor is directly traceable to ref: (a) (DEFANGO) and NOT the undersigned, you continually ask this Court to believe this falsified narrative based on the flimsy tainted and unauthenticated evidence.

13. Your CSTT side-kick DEFANGO (ref: (a)) is the sole purveyor of this "Black Cube" rumor – NOT the undersigned. This point is amplified in the STEEMIT post created during the time period in question by ref: (a) (DEFANGO) (see below).

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

Black CUBE Jason Goodman



defango (64) ▾ in news • 2 years ago

Jason Goodman, you want to play old west gunslinger with peoples reputations? Been building a case on you since you asked me to look you up. , and your connections to child pedophiles, and Mossad.

CIA SOURCE: Deep Throat confirmed by @frankbacon

Jason Goodman is on the payroll of a man named Arnan Milchan. Arnan has Jason doing work partly out of blackmail. Jason was at parties with a producer named Brian Singer and there were underaged boys and girls. Jason was being paid \$2.788 a week and its now up to \$3500 a week. Laura Loomer is making \$7000 a week from Milchan. Black Cube feed them info. Jason found out that Milchan is paying Loomer twice as much as him and thats why they had this fight. Please do not tell anyone how you got this info. Goodman's job is to deflect attention from Rahm Emanuel , Chuck Schumer and DWS. Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away. The money came from Israel. The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin. Now Milchan works with a guy named Avi Hersh. I know you and T and others know some of this stuff, but now you know the full story. Also, Alan Dershowitz has over 7 hours of Gamy Island

Internet URL: <https://steemit.com/news/@defango/black-cube-jason-goodman>

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

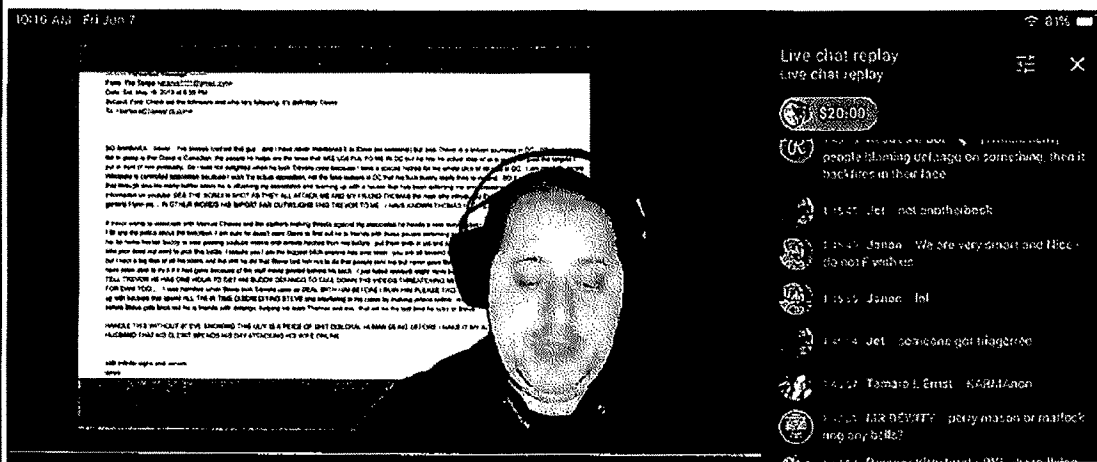
14. Your attention is directed to para. 32 of ECF Doc. No. 139 (shown below).

32. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant and has received direct instructions from Intervenor Applicant. Intervenor Applicant operates a YouTube channel under the account name "Prepper Kitty Intel PKI". Many exhibits in this instant legal matter have referenced this YouTube account. YouTube username Prepper Kitty Intel has paid Chavez via YouTube Superchat (**EXHIBIT I**)

15. Show below is EXHIBIT I, that is attached to ECF Doc. No. 139.

Case 3:17-cv-00601-MHL Document 139 Filed 07/08/19 Page 112 of 119 PageID# 2476

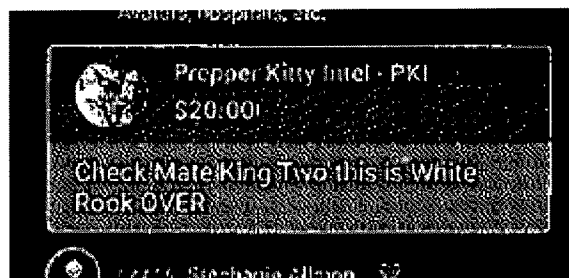
EXHIBIT I



UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
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16. EXHIBIT I is a screen shot of an apparent DEFANGO TV YouTube podcast (see above). The “super-chat” portion of the video screen shot appears below..



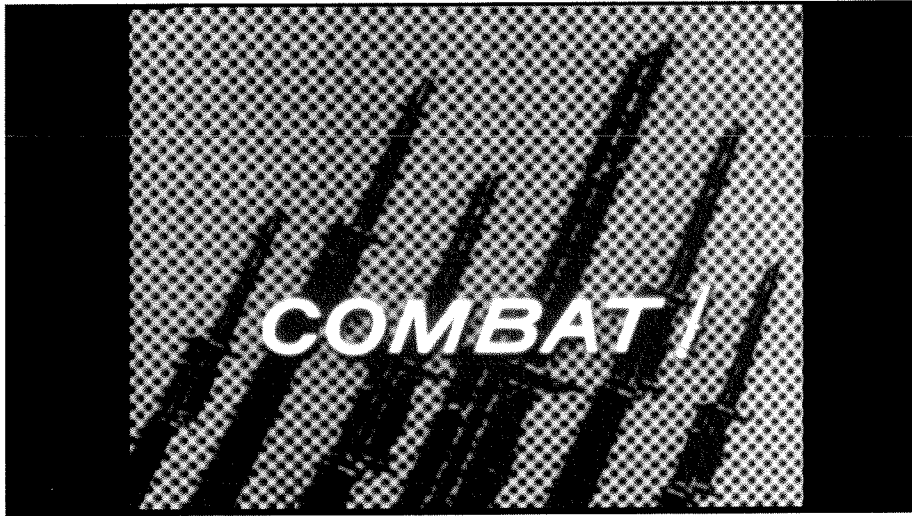
17. According to your pleading, you want this Court to consider the alleged illustrated \$20.00 “super chat” donation to DEFANGO TV (displayed in the unauthenticated exhibit – see above), with the text “Check Mate King Two this is White Rook OVER”, provides evidence that “Chavez is an associate..”[of undersigned] and “Prepper Kitty Intel has paid Chavez...”. [\$20.00].

18. At the outset, there is no Internet URL Internet address provided in EXHIBIT I, ECF Doc. No. 139. By NOT providing the correct evidentiary basis for this “exhibit” (which has been explained to you via letters in this litigation and other litigation) this exhibit is moot.

19. In sum, you expect the Court to believe that an alleged public “super-chat” donation of \$20.00 donation to ref: (a) (DEFANGO) 30-45 days ago is the equivalent of the alleged private (non-public) \$1,500.00 PATREON donation made by “AMABISS” 18 months ago. You have promoted this fallacy that the undersigned is working with members of the DEFANGO conspiracy for over 18 months on social media and court filings. This is fallacy is untrue.

20. Caveat: for your information **“Check Mate King Two this is White Rook OVER”** (which appears in the above illustrate “super-chat” text) is a comical reference to the radio call signs used in the 1960’s World War II drama television series “COMBAT” starring Rick Jason and Vic Morrow. Below is an example of the television show.

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COMBAT! s.1 ep.3: "Lost Sheep, Lost Shepherd" (1962)

Internet URL: <https://www.youtube.com/watch?v=r35lw9CWk-g&t=24s>

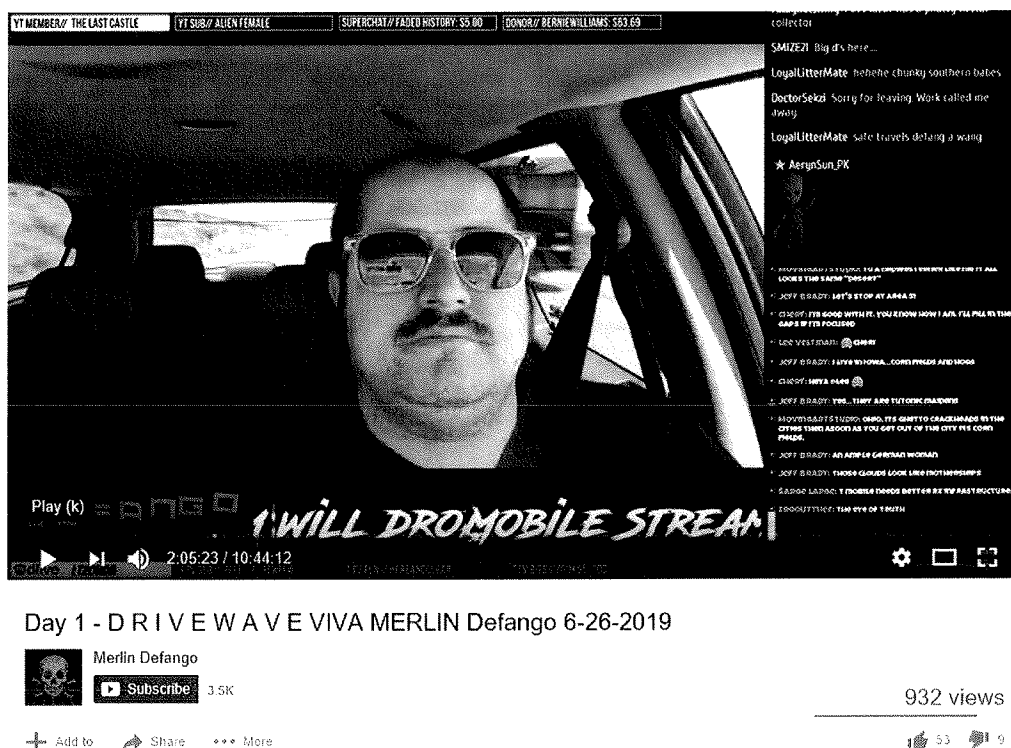
21. Your attention is directed to the following YouTube channel named "MERLIN DEFANGO", which is maintained by ref: (a) (see below).



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22. As you are well aware, you placed a telephone call to ref: (a) (DEFANGO) while he was conducting a livestream YouTube broadcast (similar to your use of livestream technology during the closure of the Port of Charleston on June 14, 2017). Your conversation you're your CSTT side-kick is available within the YouTube video content (see below) posted by ref: (a) (DEFANGO).

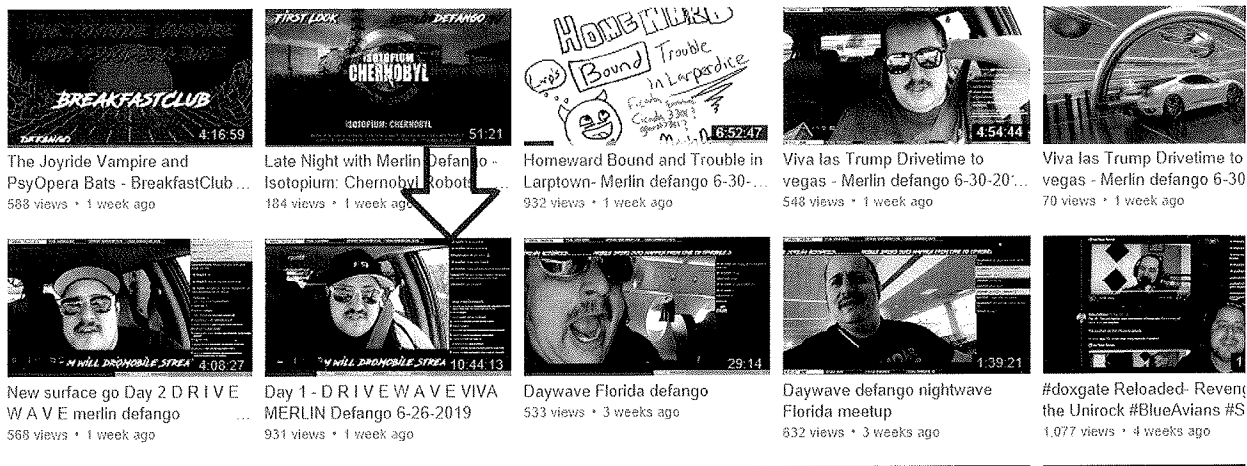


Streamed live on Jun 26, 2019
VAPORTUBE. WERE ya Been defango????

Internet URL: <https://www.youtube.com/watch?v=11dhF6m1-9g&t=7523s>

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TRANSCRIPT OF DISCUSSION

REF: (A): Oh, Jason Goodman is calling me. Hello Jason Goodman.

GOODMAN: Manual Chavez, how are you.

REF: (A): I am doing alright, just heading to Arizona right now.

GOODMAN: OH, ok. So I guess you are in a bit of a drive. I don't know if you had a chance to see my messages, but one thing I would really like to get – if your able to send it – is either a screen capture from Patreon of . uh .. the dash board, or the initial e-mail Patreon that sends you that says AMABISS has become a Patreon and shows an e-mail of that account.

...

REF: (A): I can send that over to you no problem, actually. Garble. I actually did get that e-mail . and .. all .. uh .. and I have a couple of messages for how ever many months she was on my thing and I will send you like a copy of that it shows the date and what e-mail she was using.

....

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GOODMAN: Something you would write to the Bar Association saying “hey, look, this judge determined that it is likely that Biss is making these inappropriate payments. He is not supposed to be paying you, if you’re his client, and particularly if that payment is coming at a time you are engaged in activities like making videos about his lawsuit, that spread allegations out across the Internet, that aren’t true. Things like that. So, that is my position that he had someone paying you to do that stuff. **He’s been working with Robert David Steele, you were working for Robert David Steele, at the time, Sweigert [undersigned] was working with you, Tyroan Simpson was working with you and Sweigert and these are the elements of conspiracy.**

REF: (A): Yeah, I mean you got the conspiracy down pretty well. I mean. I will send you everything that shows she was on my Patreon and she was paying me on Patreon, for sure. **But, was I working in concert with Dave Acton [undersigned] and those guys, yeah, f_ck it, why not. I will say whatever. (Laughter)**
[emphasis added]

13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications

DEFENDANT’S RESPONSE TO PLAINTIFF’S MOTION FOR RULE 11 SANCTIONS - 7

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from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

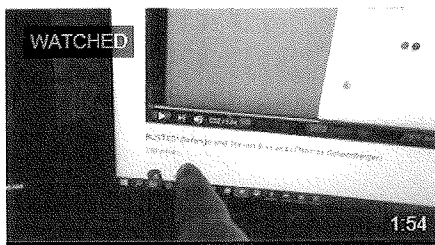
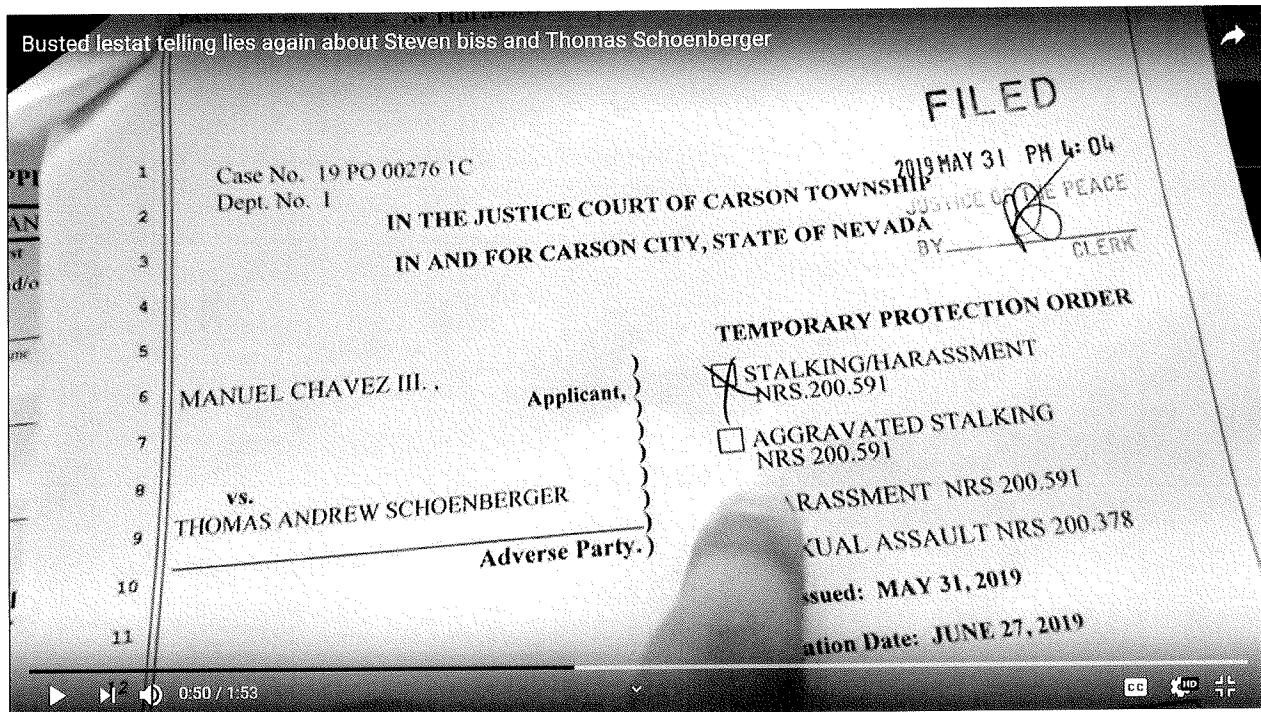
23. As you admit in the above cite, you have little or no knowledge of Thomas Shoenberger. The following information might illuminate your understanding of the false narrative you are publishing that conflates the undersigned with "the organization of the monetized conspiracy".

24. Your CSTT side-kick ref: (a) maintains several YouTube channels; e.g. DEFANGO TV, MERLIN DEFANGO and LARP WARS. In June 2019 ref: (a) published for wide distribution a dozen YouTube social media videos discussing Thomas Shoenberger and the acrimonious disputes between the two over the corporation SHADOWBOX STRATEGIES. Apparently, ref: (a), Mr. Shoenberger and Trevor Fitzgibbon (former client of Plaintiff's attorney).

25. As shown below, ref: (a) has filed a Temporary Restraining Order (TRO) against Mr. Shoenberger in the courts of Carson City, Nevada (Case No. 19 PO 00276 1C).

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MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



Busted lestat telling lies again about Steven biss
and Thomas Schoenberger

LARP WARS

1 week ago • 354 views

Lestat is still made about not being about to extort more money. So today
he's claiming that phone call where I showed Steve biss ...

Published on Jun 24, 2019

Lestat is still made about not being about to extort more money. So today he's claiming that
phone call where I showed Steve biss number and talked to him is now apparently Thomas.
What an idiot

Internet URL: <https://www.youtube.com/watch?v=svJhLWwExWw>

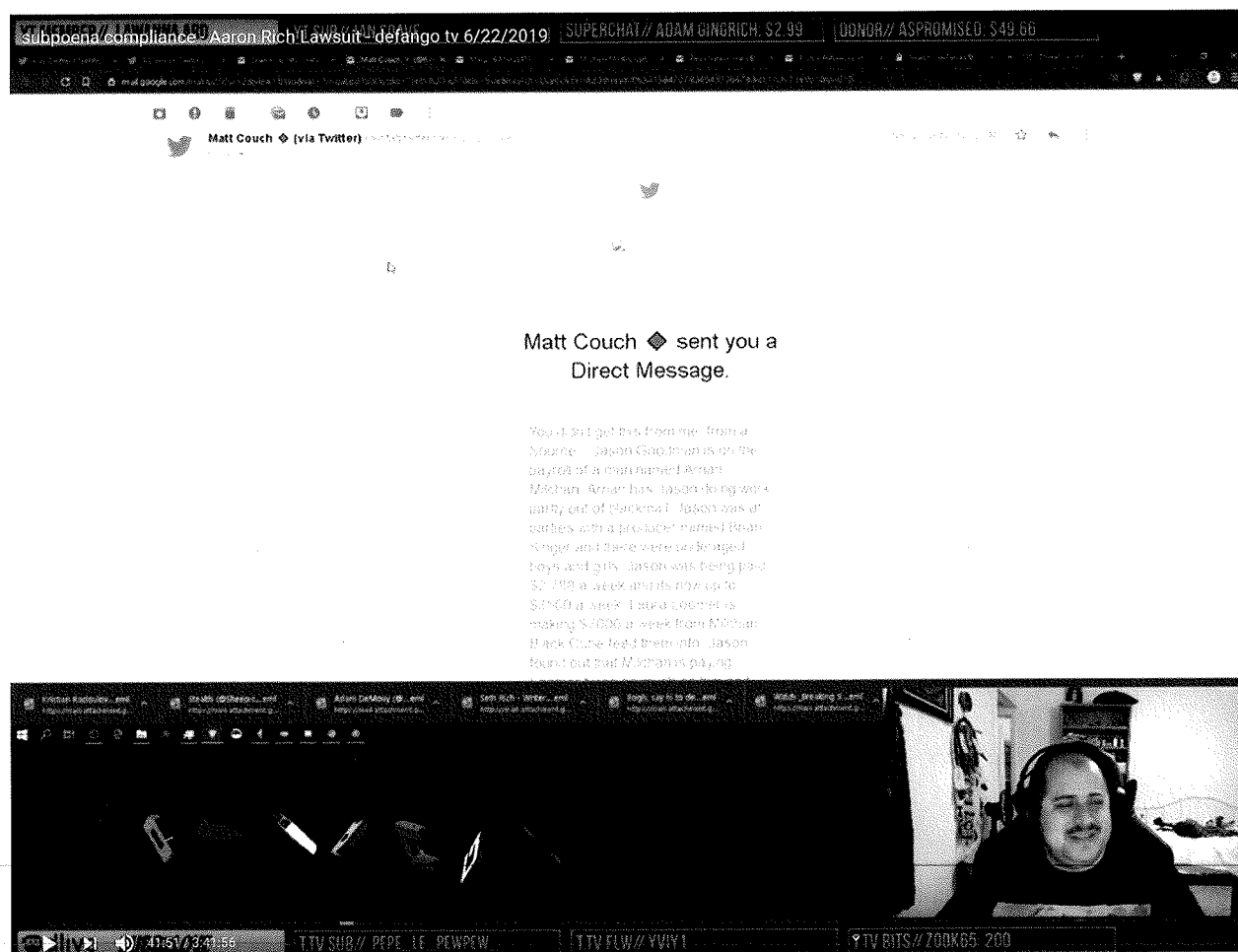
26. There have been dramatic videos related to the dispute between Mr. Schoenberger and
ref: (a), who have accused each other of lying, spreading "disinformation" and quibbling about
the formation of SHADOWBOX STRATEGIES. Both parties have very recently provided
testimony in the following case:

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

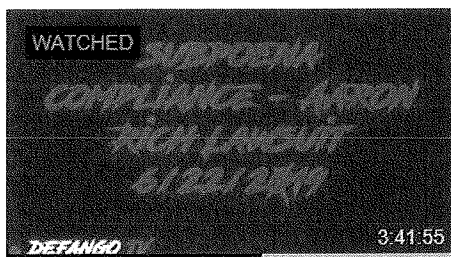
**U.S. District Court
for the District of Columbia
RICH v. BUTOWSKY et al
CASE #: 1:18-cv-00681-RJL
Judge Richard J. Leon**

27. In these recent YouTube videos it has been clearly stated by ref: (a) that it is his testimony in the above case that he was a member of a group of “reputation protection” operatives allegedly directed by Matt Couch (defendant in the above cited action). Ref: (a) has distributed in a widely pervasive manner, electronic messages from Matt Couch to support his testimony. Ref: (a) has also been vocal about evidence that he has furnished to you as well. See below:



UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
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subpoena compliance - Aaron Rich Lawsuit -
defango tv 6/22/2019

Defango TV

Streamed 1 week ago • 1,632 views

Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's ...

Streamed live on Jun 22, 2019

Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's for Court Records and whatnot. So we are getting everything on the table and building the files to FTP to the Lawyer. Any striking or anything is going to be interfering with a federal case.

Internet URL: <https://www.youtube.com/watch?v=pB7NjF1ApZg&t=7427s>

Matt Couch ♦ sent you a
Direct Message.

You didn't get this from me from a
Source Jason Goodman is on the
payroll of a man named Arnan
Milchan Arnan has Jason doing work
partly out of blackmail Jason was at
parties with a producer named Brian
Singer and there were underage
boys and girls Jason was being paid
\$2,788 a week and its now up to
\$3500 a week Laura Loomer is
making \$7,000 a week from Milchan
Black Cube feed them info Jason
found out that Milchan is paying

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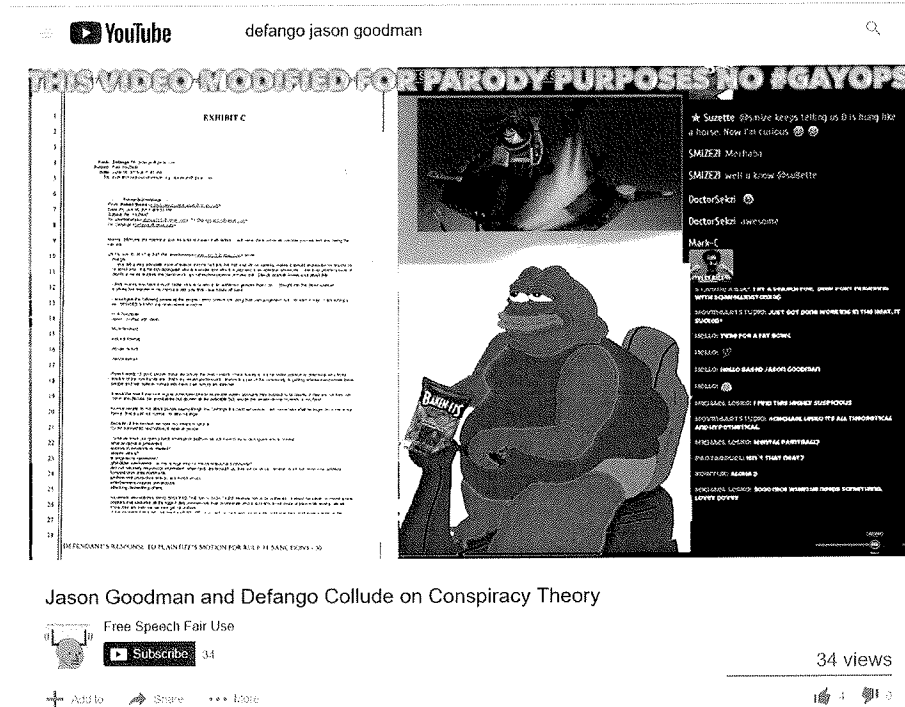
MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

28. The enlarged video screen-shot from the above video content demonstrates that the source of the “Black Cube rumor” was apparently Matt Couch – and NOT the undersigned as you continuously report. As discussed in the previous letter on this subject, dated June 30th, 2019, you have implicated the undersigned as the source of the “Black Cube” rumor. To refresh your memory the rumor states that you and Laura Loomer were being paid by a Black Cube operative, stated by ref: (a) and NOT by the undersigned.

do not tell anyone how you got this info Goodman's job is to deflect attention from Rahm Emanuel . Chuck Schumer and DWS Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away The money came from Israel The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin Now Milchan works with a guy named Avi Hersh I know you and T and others know some of this stuff but now you know the full story Also, Alan Dershowitz has over 7 hours of Orgy Island vid hidden and his vid file is called Insurance, the same name as Schumer's boy Anthony Wiener Please keep my name out of this I focus on Vegas and **Seth** But this is blow away stuff Goodman will freak when you expose this It comes directly from a CIA guy on our team

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29.



Internet URL: <https://www.youtube.com/watch?v=It5SFuVxhMM&t=266s>

TRANSCRIPT OF DISCUSSION

REF: (A): Oh, Jason Goodman is calling me. Hello Jason Goodman.

GOODMAN: Manual Chavez, how are you.

REF: (A): I am doing alright, just heading to Arizona right now.

GOODMAN: OH, ok. So I guess you are in a bit of a drive. I don't know if you had a chance to see my messages, but one thing I would really like to get – if your able to send it – is either a screen capture from Patreon of . uh .. the dash board, or the initial e-mail Patreon that sends you that says AMABISS has become a Patreon and shows an e-mail of that account.

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

REF: (A): I can send that over to you no problem, actually. Garble. I actually did get that e-mail . and .. all .. uh .. and I have a couple of messages for how ever many months she was on my thing and I will send you like a copy of that it shows the date and what e-mail she was using.

....

GOODMAN: Something you would write to the Bar Association saying “hey, look, this judge determined that it is likely that Biss is making these inappropriate payments. He is not supposed to be paying you, if you’re his client, and particularly if that payment is coming at a time you are engaged in activities like making videos about his lawsuit, that spread allegations out across the Internet, that aren’t true. Things like that. So, that is my position that he had someone paying you to do that stuff. He’s been working with Robert David Steele, you were working for Robert David Steele, at the time, Sweigert [undersigned] was working with you, Tyroan Simpson was working with you and Sweigert and these are the elements of conspiracy.

REF: (A): Yeah, I mean you got the conspiracy down pretty well. I mean. I will send you everything that shows she was on my Patreon and she was paying me on Patreon, for sure. But, was I working in concert with Dave Acton [undersigned] and those guys, yeah, f_ck it, why not. I will say whatever.
(Laughter)

30. There are other issues associated with your ECF Doc. No. 134, para. 12. Amongst these legal insufficiencies, (i) whether or not the purported evidence you propound rises to the level of sufficiency in the light of the Federal Rules of Evidence, and (ii) your use of hearsay to attempt to attribute comments to the undersigned made by ref: (a) about Black Cube (as broadcast in the video you have described as EXHIBIT I, to ECF Doc. No. 78).

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31. The legal sufficiency of the electronic messages you provide as evidence also present an open question considering the legal sufficiency requirements of the F.R.E.. As the public record clearly demonstrates, you have had a long-standing relationship with ref: (a) dating back to the infamous “Who Spoofed the Seth Rich Files” episodes of CSTT (first two weeks of June 2017 – immediately prior to your closure of the Port of Charleston, S.C. on June 14, 2017 due to your CSTT YouTube video podcasts).

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this ____/
day of June, 2019.

D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211

Attached: Copies sent to other district courts

SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - SDA

EXHIBIT FOUR

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

D.G. Sweigert, c/o

P.O. Box 152

Mesa, AZ 85211

Spoliation-notice@mailbox.org

July 1, 2019

Jason Goodman, CEO
Multimedia Systems Design, Inc.
252 7th Avenue
Suite 6-S
New York, NY 10001

Clerk of the Court, Room 3000
U.S. District Court
701 E. Broad St.
Richmond, VA 23219

MATTER: **STEELE v. GOODMAN, 17-CV-00601-MHL**

District Judge M. Hannah Lauck

SUBJECT: **PART TWO - ATTEMPTED FRAUD ON THE COURT BY
DEFENDANT GOODMAN**

REF: (a) **MANUAL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834**

Good Morning:

1. This letter addresses the allegation that you (Defendant Jason Goodman) have conspired with yet another “CrowdSource The Truth” (CSTT) social media side-kick (ref: (a)) to suborn perjury and submit tainted evidence (under oath) to this Court to support your wild speculative conspiracy theory insinuations that ignore the truth.

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

2. Your attention is kindly directed to ECF Doc. No. 134, para. 13, shown below.

13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 7

from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

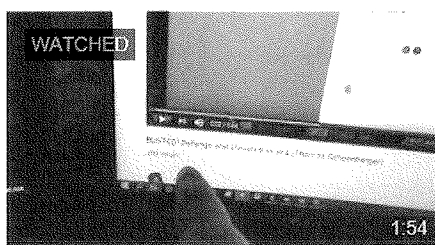
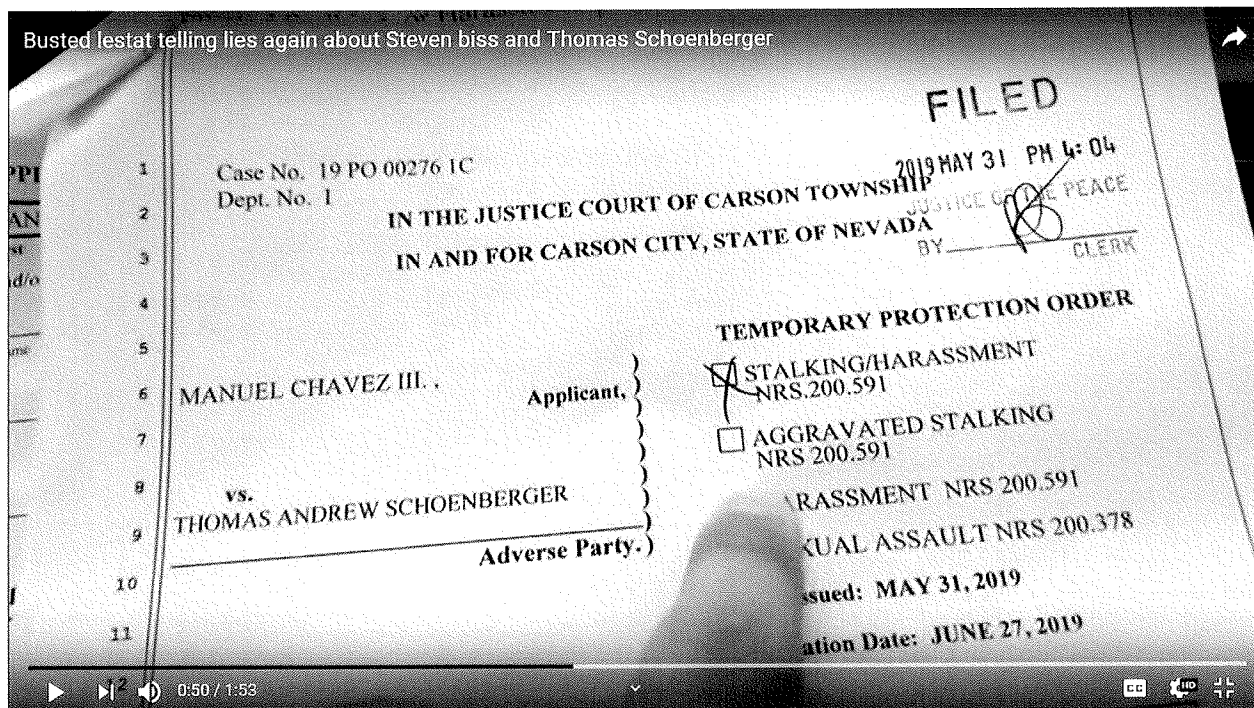
3. As you admit in the above cite, you have little or no knowledge of Thomas Shoenberger. The following information might illuminate your understanding of the false narrative you are publishing that conflates the undersigned with "the organization of the monetized conspiracy".

4. Your CSTT side-kick ref: (a) maintains several YouTube channels; e.g. DEFANGO TV, MERLIN DEFANGO and LARP WARS. In June 2019 ref: (a) published for wide distribution a dozen YouTube social media videos discussing Thomas Shoenberger and the acrimonious disputes between the two over the corporation SHADOWBOX STRATEGIES. Apparently, ref: (a), Mr. Shoenberger and Trevor Fitzgibbon (former client of Plaintiff's attorney).

5. As shown below, ref: (a) has filed a Temporary Restraining Order (TRO) against Mr. Shoenberger in the courts of Carson City, Nevada (Case No. 19 PO 00276 1C).

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RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



Busted lestat telling lies again about Steven biss and Thomas Schoenberger

LARP WARS

1 week ago • 354 views

Lestat is still made about not being about to extort more money. So today he's claiming that phone call where I showed Steve biss number and talked to him is now apparently Thomas. What an idiot

Published on Jun 24, 2019

Lestat is still made about not being about to extort more money. So today he's claiming that phone call where I showed Steve biss number and talked to him is now apparently Thomas. What an idiot

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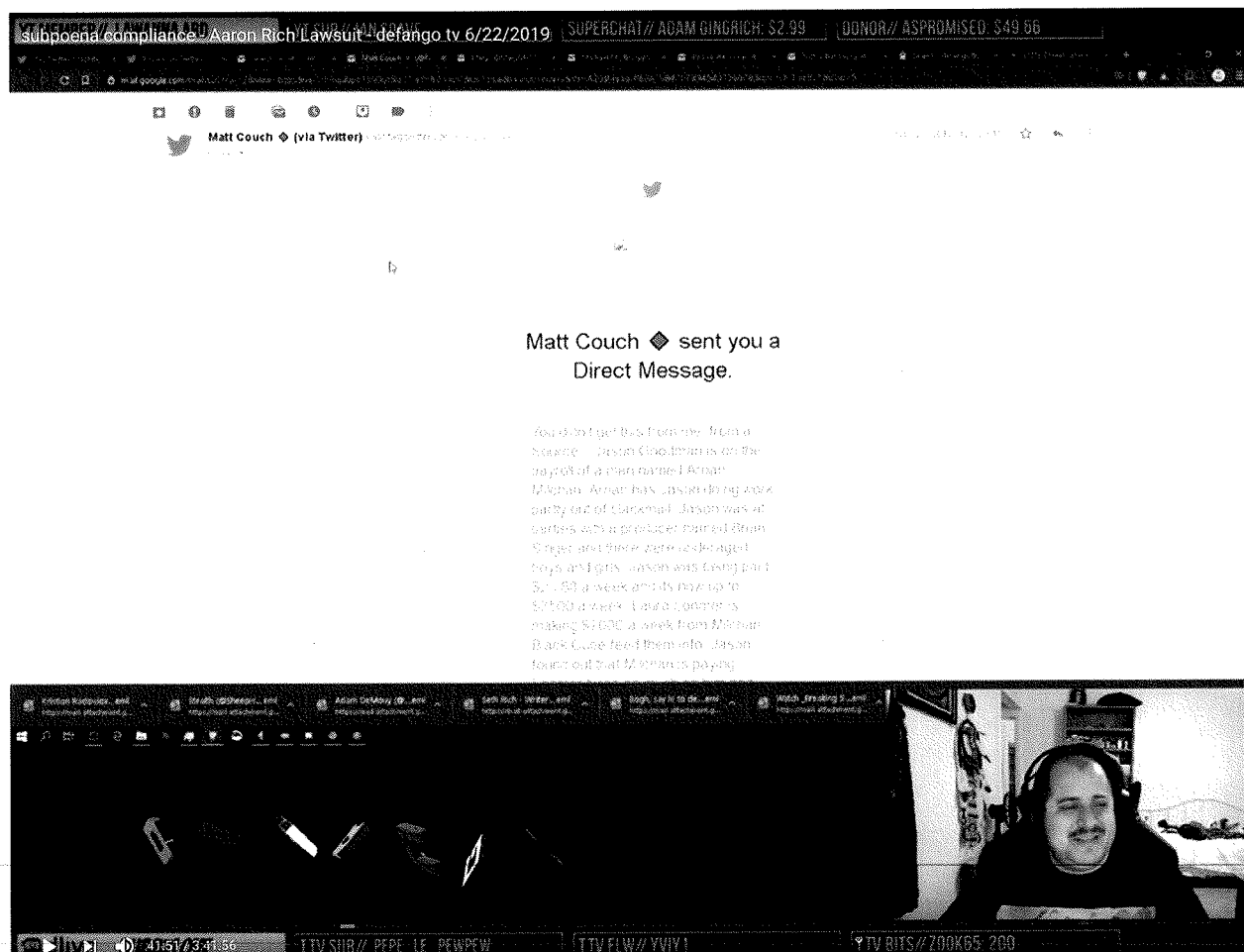
6. There have been dramatic videos related to the dispute between Mr. Schoenberger and ref: (a), who have accused each other of lying, spreading "disinformation" and quibbling about the formation of SHADOWBOX STRATEGIES. Both parties have very recently provided testimony in the following case:

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

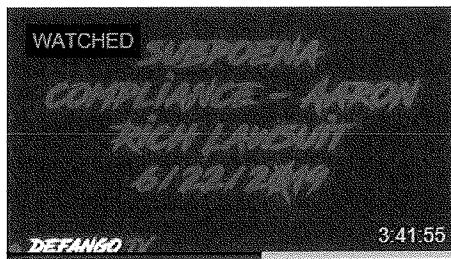
**U.S. District Court
for the District of Columbia
RICH v. BUTOWSKY et al
CASE #: 1:18-cv-00681-RJL
Judge Richard J. Leon**

7. In these recently published YouTube videos it has been clearly stated by ref: (a) that it is his testimony in the above cited lawsuit that he was a member of a group of “reputation protection” operatives allegedly directed by Matt Couch (defendant in the above cited action). Ref: (a) has distributed in a widely pervasive manner, electronic messages from Matt Couch to support his testimony. Ref: (a) has also been vocal about evidence that he has furnished to you as well. See below:



UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



subpoena compliance - Aaron Rich Lawsuit -
defango tv 6/22/2019

Defango TV

Streamed 1 week ago • 1,632 views

Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's ...

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Internet URL: <https://www.youtube.com/watch?v=pB7NjF1ApZg&t=7427s>

Matt Couch ♦ sent you a
Direct Message.

You didn't get this from me. from a Source - Jason Goodman is on the payroll of a man named Arman Milchan. Arman has Jason doing work partly out of blackmail. Jason was at parties with a producer named Brian Singer and there were underaged boys and girls. Jason was being paid \$2,788 a week and its now up to \$3500 a week. Laura Loomer is making \$7000 a week from Milchan. Black Cube feed them info. Jason found out that Milchan is paying

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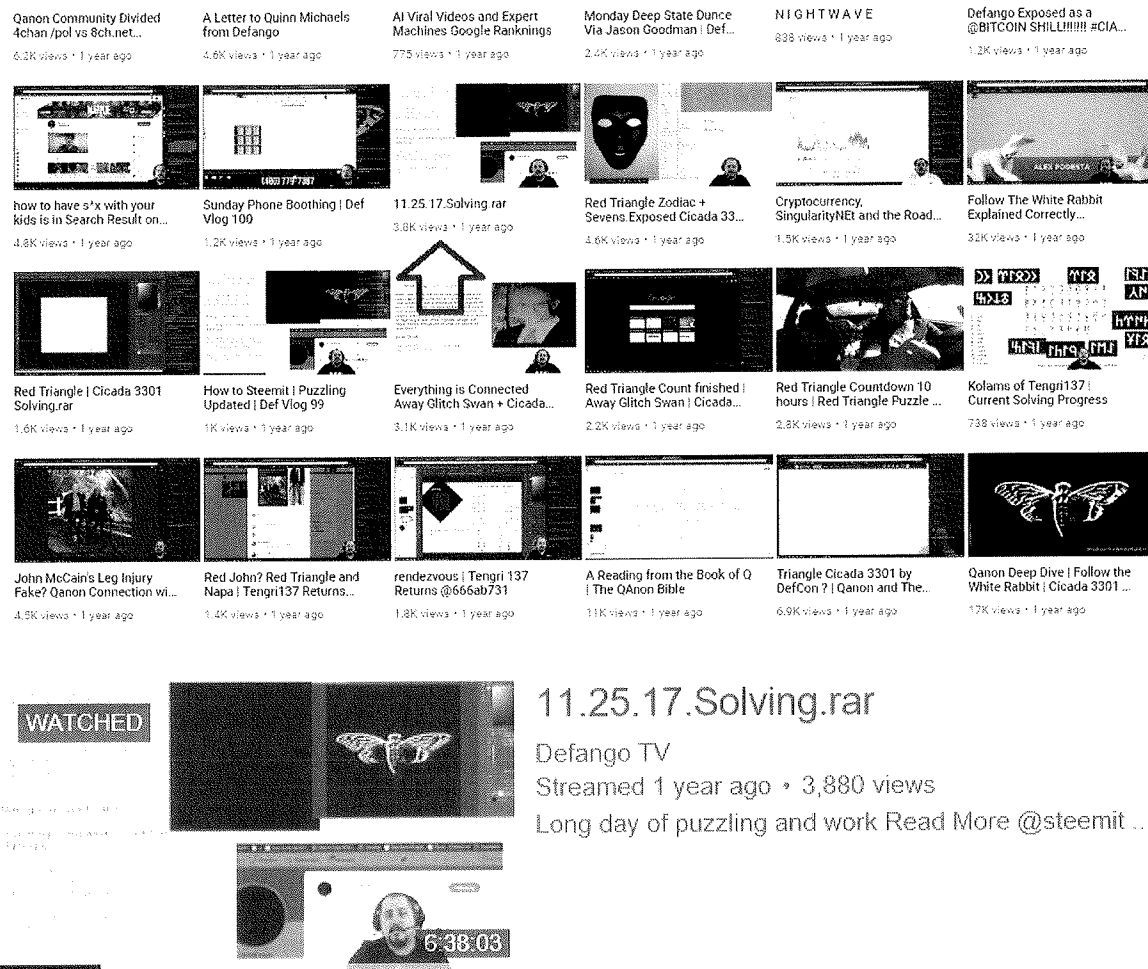
8. The enlarged video screen-shot from the above video content demonstrates that the source of the “Black Cube rumor” was apparently Matt Couch – and NOT the undersigned as you continuously report. As discussed in the previous letter on this subject, dated June 30th, 2019, you have implicated the undersigned as the source of the “Black Cube” rumor. To refresh your memory, the rumor states that you and Laura Loomer were being paid by a Black Cube operative, stated by ref: (a) and NOT by the undersigned.

do not tell anyone how you got this info Goodman's job is to deflect attention from Rahm Emanuel . Chuck Schumer and DWS Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away The money came from Israel The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin Now Milchan works with a guy named Avi Hersh I know you and T and others know some of this stuff but now you know the full story Also Alan Dershowitz has over 7 hours of Orgy Island vid hidden and his vid file is called Insurance the same name as Schumer's boy Anthony Wiener Please keep my name out of this I focus on Vegas and **Seth** But this is blow away stuff Goodman will freak when you expose this it comes directly from a CIA guy on our team

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

9. Recall that the offending Black Cube rumor remarks were made by ref: (a) in EXHIBIT I (no. 9 in ECF) of ECF Doc. No. 78, which is cited by you in para. 12 of ECF Doc. No. 134 (video entitled *11.25.17.Solving.rar*). These remarks were NOT made by the undersigned.



Streamed live on Nov 25, 2017
Long day of puzzling and work

Internet URL: <https://www.youtube.com/watch?v=jK73oCxCGOE&t=4363s>

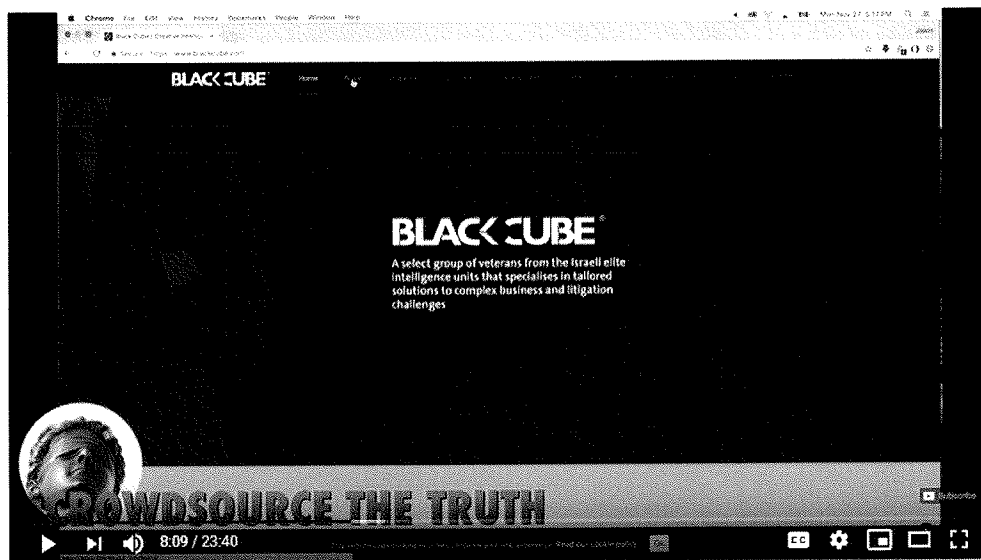
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RICHMOND DIVISION

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10. Please note in the previous letter, dated June 30th, 2019, an incorrect time-stamp was given for the remarks of ref: (a), which begin at 1:12.22 (not 1.22.22). These are the Black Cube rumor remarks that you have incorrectly attributed to the undersigned. A transcript appears below.

REF: (A). 01.12.22. It's really crazy to me too .. I was picking up on something .. uh .. Black Cube. And, like I had gotten some information about . like .. some information from quote unquote "CIA source" that was talking about how Loomer and – what's his name – Goodman were getting paid by some Black Cube, some Black Cube operative. And then it started clicking in my head.

11. It is instructive to note that you specifically featured the Black Cube corporate web-site in your video production distributed in a widely pervasive manner two (2) days after these Black Cube rumor remarks were made public by ref: (a) on 11/25/2017 (see below).



Deep State Dunces Attack George Webb & CSTT - Bitcoin Challenge Response

15,317 views

672

126

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...



Jason Goodman

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Deep State Dunces Attack George Webb & CSTT
- Bitcoin Challenge Response

Jason Goodman

Streamed 1 year ago • 15,315 views

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering ...

Streamed live on Nov 27, 2017

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering no evidence to support their claims.

Internet URL: <https://www.youtube.com/watch?v=GNxCk6nqFJg>

12. Below is a transcript of your comments as recorded in the above cited video.

GOODMAN. 07:57. They'll put out a video that where they'll say 'oh year, Jason Goodman is working for Black Cube. Now I will tell you something. I had no idea what Black Cube was, before these guys made a video about it.

13. It appears you have conflated the undersigned into the Black Cube rumor theory in spite of overwhelming evidence that this rumor is directly traceable to ref: (a) and NOT the undersigned. This point is amplified in the STEEMIT post created during the time period in question (see below).

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Black CUBE Jason Goodman



defango (64) ▾ in news • 2 years ago

Jason Goodman, you want to play old west gunslinger with peoples reputations? Been building a case on you since you asked me to look you up. , and your connections to child pedophiles, and Mossad.

CIA SOURCE: Deep Throat confirmed by @frankbacon

Jason Goodman is on the payroll of a man named Arnan Milchan. Arnan has Jason doing work partly out of blackmail. Jason was at parties with a producer named Brian Singer and there were underaged boys and girls. Jason was being paid \$2.788 a week and its now up to \$3500 a week. Laura Loomer is making \$7000 a week from Milchan. Black Cube feed them info. Jason found out that Milchan is paying Loomer twice as much as him and thats why they had this fight. Please do not tell anyone how you got this info. Goodman's job is to deflect attention from Rahm Emanuel , Chuck Schumer and DWS. Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away. The money came from Israel. The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin. Now Milchan works with a guy named Avi Hersh. I know you and T and others know some of this stuff, but now you know the full story. Also, Alex Darghewitz has over 7 hours of Grey Island

Internet URL: <https://steemit.com/news/@defango/black-cube-jason-goodman>

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

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There is a growing consensus that you are a Mossad helper who is creating a Rabbit hole with admitted Mossad helper George Webb and the purpose of the rabbit hole is to distract people away from the fact that Russia did not influence the election, Israel did.

Folks, Jason worked for over 20 years as a camera guy. Let's start looking into his friends and affiliates.

Arnan Milchan.

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First off there is his backer at about \$3500 a month for Crowdsorce the Truth. Mossad past, seems to be a good source for some of the interesting information Jason Gets from time to time and looks down the barrel at George's Breadcrumbs.

<https://www.timesofisrael.com/hollywood-producer-arnon-milchan-reveals-mossad-past/>

Jason worked on Xmen, the super hit created by Bryan Singer, who was later convicted of child pedophilia after he repeatedly took advantage of teens Singer has been accused numerous times of being a pedophile. He is openly bisexual. He called you a criminal. How will he like being forensically linked to the DNC and also convicted pedophile Bryan Singer?

14. Your allegations that somehow the undersigned worked with, worked for, conspired with or had conspiratorial planning with ref: (a) or any of his associates is completely false, devoid of truth, unfounded and meritless.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this ____/
day of July, 2019.

D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211

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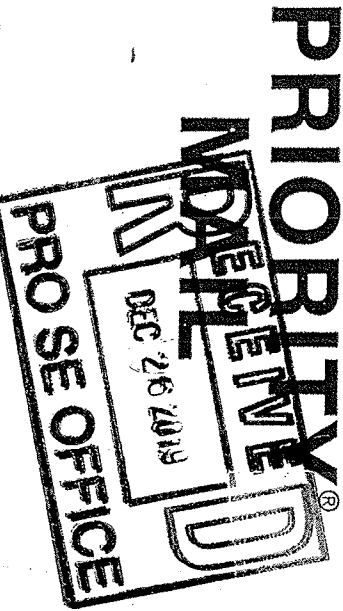
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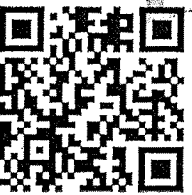
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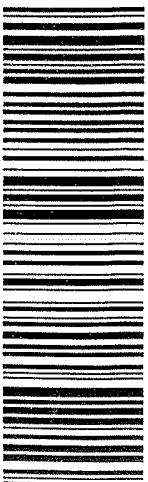
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